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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. 4:20-cv-3388-PJH

FILED UNDER SEAL

DECLARATONS IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

VOLUME 2 OF 3

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Defendants.

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DECLARATION OF EMIL GEORGE IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF EMIL T. GEORGE

Pursuant to 28 U.S.C. §1746

I, **Emil T. George**, declare and state as follows:

1. I am employed by the Federal Trade Commission ("FTC") in Washington, D.C. as a Forensic Accountant. My work address is 600 Pennsylvania Ave., N.W., Washington, D.C. 20580. I have worked at the FTC since September 2012. Prior to starting at the FTC, I was the Assistant Inspector General for Audits at the National Labor Relations Board for more than 12 years.

2. At the FTC, I provide forensic accounting assistance to trial attorneys and investigators. I am a Certified Public Accountant with the State of Maryland and hold a Bachelor of Science degree in Accounting from the University of Maryland.

3. The following facts are known to me personally and, if called as a witness, I could and would testify to the matters set forth in the following paragraphs.

Background

4. In my capacity as a forensic accountant at the FTC, I was assigned to work on the NTS IT Care ("NTS") matter. In connection therewith, I reviewed records of the corporate bank accounts that I understand were produced in response to Civil Investigative Demands issued by the FTC ("Accounts of Interest"). The records included bank statements, wire transfers, checks, deposit slips, ACH transactions, and withdrawals. A listing the of the four Accounts of Interest, including account holder's name, financial institution, account number, time periods covered by the records produced, account balances as of the last statement reviewed, and total debits and credits for each account is included as **George Attachment A**. All of the Accounts of Interest were in the name of NTS IT Care, Inc. As shown at George Attachment A, my work on the Accounts of Interest covered the period from September 2016 through September 2019. I reviewed and prepared summaries of these Accounts of Interest as detailed below.

5. To conduct this review, I used, where appropriate, the Comprehensive Financial Investigations Solution ("CFIS"), a financial investigation tool from Actionable Intelligence Technologies, Incorporated. My understanding is that CFIS is utilized, *inter alia*, by the Internal

Revenue Service, the Federal Bureau of Investigation, the Organized Crime Drug Enforcement Task Force, a number of U.S. Attorney's offices, and the United States Secret Service. Among other things, CFIS uses proprietary technology to convert paper and/or electronic account records from financial institutions into an investigative database that can be searched, analyzed, and used to issue a variety of reports that can be exported into Microsoft Excel spreadsheets.

6. The first step in using CFIS is to load the bank statements. After the statements are loaded, CFIS imports and processes the bank statements using Intelligent Document Analyzers that rely on proprietary algorithms and Optical Character Recognition technology to create a searchable database. Intelligent Document Analyzers are document format readers associated with a particular financial institution and type of statement. After a bank statement has been indexed and processed, the CFIS database record for that statement must be reconciled with the original version of the statement obtained in the proceeding (*i.e.*, the statement produced by a bank) to ensure accuracy.

7. In the instant matter, I used CFIS to generate a table containing the transactions for the four Accounts of Interest. I then exported the table into Microsoft Excel. I also reconciled the bank statement data imported into Excel with the original version of the statement to ensure accuracy. This Excel table reflected transactions from September 2016 through September 2019. By my calculation, this table reflected approximately $5.3 million in debit transactions and $5.3 million in credit transactions. Debits consisted of items such as wires out, checks paid, and withdrawals. Credits consisted of items such as bankcard credits, merchant credits, electronic funds transfer credits, and deposits. I used Excel to sort the account transactions by transaction type and/or remarks (which provide some details on the transaction).

8. I reviewed bank wires along with checks paid from and deposits made into all of the Accounts of Interest and manually added details, such as the payee or source of money, to the Excel spreadsheet.

9. I identified persons or entities that received payments ("debits") from the Accounts of Interest. As noted in Paragraph 7, these accounts had approximately $5.3 million in debits. A schedule detailing debits to any payee that totalled $50,000 or more is at **George Attachment B,**

which accounts for approximately 85 percent of total debits. I did not include details of debits to any payee that I calculated were, in total, less than $50,000. The column labeled "Percent" in George Attachment B shows the percentage of the total amount of debits that went to the specific payee listed in the row. The column labeled "Accumulated Percentage" reflects the combined percentage of the total amount paid from the Accounts of Interest to the payee listed in that row, and all Payees listed previously in the chart (for example, the Accumulated Percentage listed in row 3 reflects the total amount paid to Payees in rows 1-3).

10. I identified persons or entities that made payments ("credits") to the Accounts of Interest. A schedule detailing approximately 97 percent of the credits into the accounts is at **George Attachment C**. I did not include details of credits from any entity that I calculated were, in total, less than $50,000. As with George Attachment B, George Attachment C includes percentages and accumulated percentages.

Gross Receipts from Payment Processors

11. I was asked to estimate NTS's gross receipts from payment processors as reflected in the bank statements. It is my understanding that payment processors are companies appointed by a merchant to handle transactions from various channels such as credit cards and debit cards. To perform this calculation, I reviewed the sources of funds deposited into the Accounts of Interest and identified those that appeared to be from payment processors. My research indicated that the credit transactions identified on the bank statement as "CMS," "Bankcard," "Paymentech," and "Expitran" were from payment processors and were included in my calculation. By my calculation, NTS's gross receipts from payment processors totaled approximately $4.9 million during the period of September 2016 through September 2019.

International Wire Transactions

12. I identified three recipients of international bank wire transactions ("wires") made from the Accounts of Interest that, in total, exceeded $100,000. There were 81 wires to these three recipients that totaled $3,840,400 during the period of September 2016 through September 2019.

13. By my calculation, 54 wires totaling $2,688,500 were made to a recipient entitled NTS Global Services Pvt. Ltd. in India. These wires occurred between October 2016 and February 2019. A schedule detailing these transactions is at **George Attachment D**.

14. By my calculation, 19 wires totaling $724,900 were made to a recipient entitled HDFC Bank Ltd. in India. These wires occurred between March and September 2019. A schedule detailing these transactions is at **George Attachment E.**

15. By my calculation, eight wires totaling $427,000 were made to a recipient entitled NTS Consulting Services in India. These wires occurred between September 2016 and November 2017. A schedule detailing these transactions is at **George Attachment F.**

Leads and Marketing

16. I identified payments made from the Accounts of Interest for leads and marketing. I reviewed documentation of bank wire transactions for information identifying whether the words "lead," "leads" or "marketing" were mentioned in the transaction documentation. For some transactions, the words "lead," "leads" or "marketing" were used by themselves or together. By my calculation, documentation for approximately $2.5 million of the bank wire transactions contained the words "lead," "leads" or "marketing." In the majority of instances, the words "lead," "leads" and "marketing" were combined with a reference to "payroll." Approximately $500,000 of the $2.5 million did not include a reference to payroll or other such items, and referred only to "lead," "leads" or "marketing.". These transactions included some of the payments to NTS Global Services Pvt. Ltd. and NTS Consulting Services identified in Paragraph 13, Paragraph 15, George Attachment D, and George Attachment F of this declaration.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on March 5, 2020.

Emil T. George

George Attachment A

Accounts of Interest

Item	Name	Bank	Account	First Statement Reviewed Ending Date	Last Statement Reviewed Ending Date	Balance at Last Statement Reviewed	Total Debits	Total Credits
1	NTS IT Care Inc	Citibank	#8391	9/30/16	2/28/19	0.00	4,428,500.03	4,378,588.65
2	NTS IT Care Inc	Citibank	#8393	1/31/19	2/28/19	0.00	5,244.19	5,244.19
3	NTS IT Care Inc	Comerica	#4500	6/30/17	1/31/19	0.00	14,363.64	14,363.64
4	NTS IT Care Inc	JPMorgan Chase	#2221	2/28/19	9/30/19	30,578.96	920,764.60	951,343.56
	Total						**5,368,872.46**	**5,349,540.04**

George Attachment B

Payments from Accounts of Interest				
Line	**Payee\Description**	**Amount**	**Percent**	**Accumulated Percentage**
1	NTS Global Services Pvt Ltd - India	2,688,500.00	50.08%	50.08%
2	Hdfc Bank Ltd Kanjur Marg East Mumbai India	724,900.00	13.50%	63.58%
3	NTS Consulting Services - India	427,000.00	7.95%	71.53%
4	PayChex	157,000.80	2.92%	74.46%
5	CMS - Discount	129,050.28	2.40%	76.86%
6	Sky Wealth Asia Pacific Limited - Bratislava Slovakia/Hong Kong	85,739.00	1.60%	78.46%
7	RTK Media Inc	77,783.00	1.45%	79.90%
8	International Wires Out - Documentation Not Available	75,000.00	1.40%	81.30%
9	Withdrawals	65,633.76	1.22%	82.52%
10	Citicard(s)	62,492.51	1.16%	83.69%
11	Chaseup LLC	55,469.00	1.03%	84.72%
12	Payees receiving less than $50,000	820,304.11	15.28%	100.00%
	Total	**5,368,872.46**		

George Attachment C

Source of Payments to Accounts of Interest

Line	Forensic Accountant Beneficiary	Amount	Percent	Accumulated Percentage
1	CMS - Deposits	4,031,538.64	75.36%	75.36%
2	Bankcard - Deposits	870,082.82	16.26%	91.63%
3	NTS Software Services Inc	205,000.00	3.83%	95.46%
4	Paymentech	79,737.97	1.49%	96.95%
5	Sources paying less than $50,000	163,180.61	3.05%	100.00%
	Total	**5,349,540.04**		

George Attachment D

Payments to NTS Global Services Pvt Ltd - India

Line	Name\Bank\Account	Posted Date	Amount	Description
1	NTS IT Care Inc (Citibank FSB #8391)	10/14/2016	50,000.00	International Wire Out
2	NTS IT Care Inc (Citibank FSB #8391)	11/4/2016	48,000.00	International Wire Out
3	NTS IT Care Inc (Citibank FSB #8391)	12/5/2016	72,000.00	International Wire Out
4	NTS IT Care Inc (Citibank FSB #8391)	12/19/2016	65,000.00	International Wire Out
5	NTS IT Care Inc (Citibank FSB #8391)	1/6/2017	60,000.00	International Wire Out
6	NTS IT Care Inc (Citibank FSB #8391)	1/17/2017	53,000.00	International Wire Out
7	NTS IT Care Inc (Citibank FSB #8391)	1/27/2017	65,000.00	International Wire Out
8	NTS IT Care Inc (Citibank FSB #8391)	2/6/2017	57,000.00	International Wire Out
9	NTS IT Care Inc (Citibank FSB #8391)	2/22/2017	55,000.00	International Wire Out
10	NTS IT Care Inc (Citibank FSB #8391)	3/6/2017	37,000.00	International Wire Out
11	NTS IT Care Inc (Citibank FSB #8391)	3/20/2017	50,000.00	International Wire Out
12	NTS IT Care Inc (Citibank FSB #8391)	4/7/2017	80,000.00	International Wire Out
13	NTS IT Care Inc (Citibank FSB #8391)	4/24/2017	60,000.00	International Wire Out
14	NTS IT Care Inc (Citibank FSB #8391)	5/8/2017	38,000.00	International Wire Out
15	NTS IT Care Inc (Citibank FSB #8391)	5/26/2017	60,000.00	International Wire Out
16	NTS IT Care Inc (Citibank FSB #8391)	6/12/2017	38,000.00	International Wire Out

Payments to NTS Global Services Pvt Ltd - India				
Line	Name\Bank\Account	Posted Date	Amount	Description
17	NTS IT Care Inc (Citibank FSB #8391)	7/10/2017	52,000.00	International Wire Out
18	NTS IT Care Inc (Citibank FSB #8391)	7/24/2017	50,000.00	International Wire Out
19	NTS IT Care Inc (Citibank FSB #8391)	8/7/2017	33,000.00	International Wire Out
20	NTS IT Care Inc (Citibank FSB #8391)	8/28/2017	60,000.00	International Wire Out
21	NTS IT Care Inc (Citibank FSB #8391)	9/6/2017	52,000.00	International Wire Out
22	NTS IT Care Inc (Citibank FSB #8391)	9/15/2017	30,000.00	International Wire Out
23	NTS IT Care Inc (Citibank FSB #8391)	10/6/2017	22,500.00	International Wire Out
24	NTS IT Care Inc (Citibank FSB #8391)	11/6/2017	58,000.00	International Wire Out
25	NTS IT Care Inc (Citibank FSB #8391)	11/17/2017	35,000.00	International Wire Out
26	NTS IT Care Inc (Citibank FSB #8391)	12/6/2017	30,000.00	International Wire Out
27	NTS IT Care Inc (Citibank FSB #8391)	12/14/2017	38,000.00	International Wire Out
28	NTS IT Care Inc (Citibank FSB #8391)	1/5/2018	25,000.00	International Wire Out
29	NTS IT Care Inc (Citibank FSB #8391)	2/5/2018	70,000.00	International Wire Out
30	NTS IT Care Inc (Citibank FSB #8391)	2/20/2018	41,000.00	International Wire Out
31	NTS IT Care Inc (Citibank FSB #8391)	3/6/2018	50,000.00	International Wire Out
32	NTS IT Care Inc (Citibank FSB #8391)	4/6/2018	50,000.00	International Wire Out

Payments to NTS Global Services Pvt Ltd - India				
Line	Name\Bank\Account	Posted Date	Amount	Description
33	NTS IT Care Inc (Citibank FSB #8391)	4/13/2018	20,000.00	International Wire Out
34	NTS IT Care Inc (Citibank FSB #8391)	4/23/2018	30,000.00	International Wire Out
35	NTS IT Care Inc (Citibank FSB #8391)	5/7/2018	38,000.00	International Wire Out
36	NTS IT Care Inc (Citibank FSB #8391)	5/22/2018	39,000.00	International Wire Out
37	NTS IT Care Inc (Citibank FSB #8391)	6/6/2018	67,000.00	International Wire Out
38	NTS IT Care Inc (Citibank FSB #8391)	6/18/2018	37,000.00	International Wire Out
39	NTS IT Care Inc (Citibank FSB #8391)	7/6/2018	51,000.00	International Wire Out
40	NTS IT Care Inc (Citibank FSB #8391)	7/20/2018	50,000.00	International Wire Out
41	NTS IT Care Inc (Citibank FSB #8391)	8/6/2018	88,000.00	International Wire Out
42	NTS IT Care Inc (Citibank FSB #8391)	8/17/2018	64,000.00	International Wire Out
43	NTS IT Care Inc (Citibank FSB #8391)	9/4/2018	48,000.00	International Wire Out
44	NTS IT Care Inc (Citibank FSB #8391)	9/21/2018	50,000.00	International Wire Out
45	NTS IT Care Inc (Citibank FSB #8391)	10/9/2018	40,000.00	International Wire Out
46	NTS IT Care Inc (Citibank FSB #8391)	10/22/2018	45,000.00	International Wire Out
47	NTS IT Care Inc (Citibank FSB #8391)	11/13/2018	67,500.00	International Wire Out
48	NTS IT Care Inc (Citibank FSB #8391)	11/26/2018	55,000.00	International Wire Out

Payments to NTS Global Services Pvt Ltd - India				
Line	**Name\Bank\Account**	**Posted Date**	**Amount**	**Description**
49	NTS IT Care Inc (Citibank FSB #8391)	12/7/2018	68,500.00	International Wire Out
50	NTS IT Care Inc (Citibank FSB #8391)	12/18/2018	50,000.00	International Wire Out
51	NTS IT Care Inc (Citibank FSB #8391)	1/4/2019	55,000.00	International Wire Out
52	NTS IT Care Inc (Citibank FSB #8391)	1/22/2019	63,000.00	International Wire Out
53	NTS IT Care Inc (Citibank FSB #8391)	2/14/2019	30,000.00	International Wire Out
54	NTS IT Care Inc (JPMorgan Chase Bank #2221)	2/25/2019	48,000.00	International Wire Out
	Total		**2,688,500.00**	

George Attachment E

Payments to HDFC Bank Ltd - India

Line	Name\Bank\Account	Posted Date	Amount	Description
1	NTS IT Care Inc (JPMorgan Chase #2221)	3/11/2019	5,000.00	International Wire Out
2	NTS IT Care Inc (JPMorgan Chase #2221)	3/12/2019	50,000.00	International Wire Out
3	NTS IT Care Inc (JPMorgan Chase #2221)	3/22/2019	42,000.00	International Wire Out
4	NTS IT Care Inc (JPMorgan Chase #2221)	4/5/2019	33,500.00	International Wire Out
5	NTS IT Care Inc (JPMorgan Chase #2221)	4/15/2019	50,000.00	International Wire Out
6	NTS IT Care Inc (JPMorgan Chase #2221)	4/23/2019	32,000.00	International Wire Out
7	NTS IT Care Inc (JPMorgan Chase #2221)	5/3/2019	46,000.00	International Wire Out
8	NTS IT Care Inc (JPMorgan Chase #2221)	5/13/2019	47,000.00	International Wire Out
9	NTS IT Care Inc (JPMorgan Chase #2221)	5/24/2019	30,000.00	International Wire Out
10	NTS IT Care Inc (JPMorgan Chase #2221)	6/10/2019	47,000.00	International Wire Out
11	NTS IT Care Inc (JPMorgan Chase #2221)	6/21/2019	45,800.00	International Wire Out
12	NTS IT Care Inc (JPMorgan Chase #2221)	6/28/2019	36,700.00	International Wire Out
13	NTS IT Care Inc (JPMorgan Chase #2221)	7/9/2019	37,400.00	International Wire Out
14	NTS IT Care Inc (JPMorgan Chase #2221)	7/22/2019	50,000.00	International Wire Out
15	NTS IT Care Inc (JPMorgan Chase #2221)	8/6/2019	32,500.00	International Wire Out
16	NTS IT Care Inc (JPMorgan Chase #2221)	8/19/2019	33,500.00	International Wire Out

Payments to HDFC Bank Ltd - India				
Line	**Name\Bank\Account**	**Posted Date**	**Amount**	**Description**
17	NTS IT Care Inc (JPMorgan Chase #2221)	9/3/2019	42,000.00	International Wire Out
18	NTS IT Care Inc (JPMorgan Chase #2221)	9/13/2019	30,000.00	International Wire Out
19	NTS IT Care Inc (JPMorgan Chase #2221)	9/24/2019	34,500.00	International Wire Out
	Total		**724,900.00**	

George Attachment F

Payments to NTS Consulting Services - India				
Line	**Name\Bank\Account**	**Posted Date**	**Amount**	**Description**
1	NTS IT Care Inc (Citibank FSB #8391)	9/19/2016	75,000.00	International Wire Out
2	NTS IT Care Inc (Citibank FSB #8391)	9/30/2016	75,000.00	International Wire Out
3	NTS IT Care Inc (Citibank FSB #8391)	10/21/2016	50,000.00	International Wire Out
4	NTS IT Care Inc (Citibank FSB #8391)	10/31/2016	50,000.00	International Wire Out
5	NTS IT Care Inc (Citibank FSB #8391)	11/14/2016	50,000.00	International Wire Out
6	NTS IT Care Inc (Citibank FSB #8391)	11/23/2016	62,000.00	International Wire Out
7	NTS IT Care Inc (Citibank FSB #8391)	2/13/2017	25,000.00	International Wire Out
8	NTS IT Care Inc (Citibank FSB #8391)	11/28/2017	40,000.00	International Wire Out
	Total		**427,000.00**	

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Defendants.

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DECLARATION OF DEVON BETTS IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF DEVON BETTS

1. My name is Devon Betts, I am a citizen of the United States, and I reside in Beloit, Wisconsin. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. I am the founder, owner, and operator of Stop Phone Scammers ("SPS"). The goal of SPS is to expose phone scammers, mostly companies that sell computer security software and "tech support" services. The primary way I achieve this is by being a "scambaiter." I call tech support companies and allow their representatives to remotely access my computer. During the call, which I record, the representatives claim to diagnose supposed problems or issues with my computer system. Towards the end of the call, I expose the representatives by showing them that the steps they took to diagnose the supposed problems in my computer are, in fact, only scare tactics to make me believe that I need to buy their companies' tech support services.

3. In doing this, I hope to expose and stop these tech support companies and to raise awareness of tech support scams in general. SPS's website, www.stopphonescammers.com, posts recordings of calls to tech support companies and provides information about the tricks used by tech support scammers, what they want, and tips to avoid being scammed. I also post the recordings on SPS's YouTube channel. On occasion, I present to senior citizen groups and educate them on how to avoid being scammed.

4. I have no certification or formal training on computers. I am completely self-taught and started learning about computers in 2011.

5. On August 23, 2019, I sent the Federal Trade Commission a copy of the recording of my call to representatives of NTS IT CARE ("NTS"). Before I provided the files to the FTC, I had saved the unedited recording to my computer's hard drive. No one has access to my computer hard drive but me. I used the unedited recording to create a final, production quality recording that I uploaded to the Internet. The final recording includes a few edits that protect my brand, add context, and enhance viewability such as a copyright notice, my SPS logo, and shortened hold times when I was placed on hold. Attached as **Betts Attachment A** is a true and

correct copy of the final video recording. Attached as **Betts Attachment B** is a true and correct copy of a transcript of this video recording.

Summary of October 9, 2017 Phone Call with NTS

6. On October 9, 2017, I called and recorded representatives of NTS. Below is a true and accurate summary of my call.

7. For my call to NTS, I used a virtual machine that I created. A virtual machine is a software computer within a physical computer, and is capable of running a dedicated operating system and system applications. Virtual machines are common in the information technology & security industry because they provide users with a barrier between the virtualized computing environment and their physical computer. In the context of my work, I use virtual machines to protect my actual machine from malicious actors that I interact with. Any actions that malicious actors may take on my virtual machine are limited to the virtual machine and cannot compromise my physical computer. Malicious actors cannot easily determine that I am interacting with them through a virtual machine, and I can destroy and reboot the virtual machine at any time.

8. The virtual machine I created was running the Windows 8 operating system. In addition to the operating system, I installed additional programs on the machine. Specifically, I installed Comodo Internet Security and VMware Tools. I made sure that the virtual machine had antivirus and security protection and that is why I installed Comodo Internet Security.

9. In addition to the programs installed on the virtual machine, I also used Faststone Capture software, which was installed on my physical computer. Faststone Capture is a screen capture tool and screen video recorder. It allows you to easily capture and annotate anything on the computer screen, including windows, objects, menus, full screen, rectangular/freehand/fixed regions, and scrolling windows/web pages. It also allows you to record all of the computer screen activities, including onscreen changes, speech from microphone, mouse movements and clicks into highly compressed video files. All audio was recorded by the Faststone Capture software.

10. I knew, before the call, that my computer was clean and had no viruses, spyware,

malware, hackers, or any other performance or security issues because when I setup the virtual machine, I made a fresh installation of the operating system and anti-virus programs.

11. On October 9, 2017, I logged into the preconfigured virtual machine that I created (described above) and began searching for potential tech support scams. Based on my research and experience, I know that fraudulent pop-ups are commonly delivered via "typosquatting," which is a form of cybersquatting that targets Internet users who incorrectly type a website address into their web browser. Malicious actors will often register mis-spellings of popular websites, which are used as the vehicle to deliver malicious pop-ups. For example, visiting "fgoogle.com" with the added "f" instead of the properly spelled "google.com". Although I do not remember which website I visited, a pop up was delivered to my computer at approximately 12:42 PM (01:54)[1]. The pop-up told me that my computer had been blocked, that it was infected with a virus, and that my information was being stolen. Below is the text of the pop-up:

> ****YOUR COMPUTER HAS BEEN BLOCKED****
>
> **Error# 268D3**
>
> **Please call us immediately at: (888) 248-8302**
> **Do not ignore this critical alert.**
> **If you close this page, your computer access will be disabled to prevent further damage to our network.**
>
> **Your computer has alerted us that it has been infected with a virus and spyware. The following information is being stolen…**
>
> **> Facebook Login**
> **> Credit Card Details**
> **> Email Account Login**
> **> Photos stored on this computer**
>
> **You must contact us immediately so that our engineers can walk you through the removal process over the phone. Please call us within the next 5 minutes to prevent your computer from being disabled.**
>
> **Toll Free: (888) 248-8302**

[1] Parentheticals citations throughout this declaration correspond to Betts Attachments A and B, and denote where the described activities occur (by minute and second) in the video recording of the October 9, 2017 call.

12. I called the toll free number on the pop-up and was connected to a representative who identified himself as David with NTS (02:10). I described the pop-up to David, who then asked a series of questions about the alert and the type of computer I was using. David then asked to connect to my computer to diagnose the problem I was experiencing (03:14). To do so, David led me through a series of steps that ultimately directed me to a LogMeIn website, https://secure.logmeinrescue.com. LogMeIn is a software provider that provides remote connectivity solutions. When I reached this website, David instructed me to enter the following six-digit support code to establish the connection: 901442. After entering the six-digit code and following the subsequent prompts, the remote access session began and David had control over my virtual machine (07:10).

13. After establishing the connection, a chat window appeared with the word NTS in the window header. David continued to ask me questions about my browsing activity and the type of computer I was using. David then informed me that he was "running a security scan" so he could tell me what the "exact problem" was (08:10).

14. David opened the Windows command prompt and ran the "tracert" command against the website networksetting.com. David then launched the Run command box again and entered "msconfig," which opened a Windows System Configuration panel (09:13). David then directed my attention to a list of various services provided by Microsoft. He then informed me that there are several "stopped" services that are "not running" on my computer. David then told me that the "most important thing" is that "some of the network services are also not running," which could be why I'm getting "this problem." David then explains that "there are some errors on this computer" and that's the reason the "services are not running" (10:05). I knew that David was lying because stopped services are a perfectly normal part of the Windows operating system.

15. David then launched the Run command box again and entered "eventvwr," which opened the Windows Event Viewer panel (10:15). David asked me if I have anti-virus, and I respond by telling him that I have whatever came with my computer and that I don't remember

the specific name of the anti-virus software. David begins navigating the Event Viewer panel and tells me that my computer is "working a little bit slow." (11:08)

16. David then launched the Notepad application and began typing a toll free phone number and the full name of his company ("NTS IT CARE") in the Notepad document, and stated "right now you are connected with NTS IT Care" (12:27). David then told me that NTS needs "to install some protections on this computer because the network security is not running the firewall and we have to enable the services [inaudible] stopped and we have to clean the errors on this computer and hidden virus" (13:15).

17. I then pretend to agree that I need the aforementioned services. David then informed me that NTS will "block all the unwanted links and all the unwanted advertisements from the browser" (13:50). David told me that I would need to install ant-virus because he does not see any installed (14:20). David then wrote a list of the following services on the Notepad document: "network security, browser security, clean up, enable all the microsoft services, antivirus" (14:45).

18. David then told me that there is a "nominal, one time charge for the security" and began explaining the various support packages and the associated costs of each. David wrote details for three packages ranging from one to three years on the Notepad document and asked me which one I would like. I pretend to agree to the three-year support package for $449.99 (15:50). After doing so, David asked me to provide my name, phone number, email address, billing address, credit card type, credit card number, credit card expiration date, and credit card cvv code by typing the information into the Notepad application (18:35). I created a fabricated identity and entered the requested information into the document. After doing so, David told me that he will connect me to the billing department who will generate an invoice and agreement.

19. I'm then connected to another representative who introduces himself as someone in the billing department (18:50). The representative confirmed my interest in the services I agreed to with David, and proceeded to give me details about what I was purchasing while simultaneously attempting to navigate to a "verification page" through my web browser. The

representative attempted to navigate to a rightsignature.com website but had trouble opening the page. Based on my research, RightSignature appears to be a web based, e-signing platform. The representative then told me that he would conduct the verification through "the desktop" (21:57).

20. The representative then launched the Notepad application and pasted a block of text into the document. The representative informed me that this is an "authorization" and began reciting the text of the authorization, which outlined the services I was agreeing to along with the associated costs. The authorization was written in the first person point of view and was signed by the pseudonym I created, Richard Dillydot (22:10).

21. In the midst of the representative's recitation of the agreement, I noticed that the rightsignature.com website he was attempting to open had finally opened. I navigated to the browser window and saw an electronic authorization form. I noticed that the form associated NTS with the address of "1605 S Main St Ste 125 Milpitas CA 95035" (22:40)." The representative told me to ignore that form and redirected me to the Notepad authorization.

22. After he finished reciting the authorization, I acknowledged the authorization by mumbling "Mhm." I was then placed on a hold while the representative attempted to process my credit card. Shortly thereafter, the representative got back on the phone and informed me that he was unable to process my credit card. The representative asked me to re-enter my credit card number into the notepad document, at which point I revealed my intentions by entering the following: "**5369-5236-6858-THIS IS A SCAM!"** (25:02). I then told the representative that the card doesn't work on scammers and that it is a fake card. I told the representative that he is being recorded. After being confronted, the representative disconnected the call and rebooted my virtual machine into safe mode. I then communicated with NTS via the LogMeIn chat window and told them that I would be posting a video of this recording on the Internet.

23. I conclude the video by explaining why NTS was a scam and warning my viewers about the scare tactics employed by the company. (26:05). I explained that the NTS representative did not do any legitimate check to diagnose whether there was a virus on my computer.

24. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 28th, 2019, in Wisconsin.

Devon Betts

Betts Attachment A
(Filed in native format - see attached CD)

Betts Attachment B

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 1923116

TITLE NTS IT CARE

DATE RECORDED: DATE UNKNOWN
TRANSCRIBED: NOVEMBER 4, 2019

PAGES 1 THROUGH 25

NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers

For The Record, Inc.
(301) 870-8025 - www.ftrinc.net - (800) 921-5555

FEDERAL TRADE COMMISSION

I N D E X

RECORDING: PAGE:
NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers 4

FEDERAL TRADE COMMISSION

In the Matter of:	)
NTS IT Care	) Matter No. 1923116
	)
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	Date Unknown

The following transcript was produced from a digital file provided to For The Record, Inc. on October 21, 2019.

P R O C E E D I N G S

- - - - -

NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers

ON SCREEN: DISCLAIMER

The purpose of this video is to raise awareness of 'Scamming'. Scamming is the illegal practice of deliberately misdiagnosing errors and/or issues with individuals' personal computers in order to convince those individuals to pay (often large sums of money) for software and services that innocent individuals do not need.

This video in no way focuses on specific ethnic, religious, political or social groups or individuals. No offence is intended.

Scamming is illegal, no matter who does it and where in the world they do it. Hopefully, by watching this video, potential victims of Scamming can avoid the time, cost and embarrassment of being lied to and taken advantage of.

ON SCREEN: COPYRIGHT NOTICE

This video (or any other video by Stop Phone Scammers) is NOT to be re-uploaded, copied or hosted on any other website without written permission by the Chairman of Stop Phone Scammers. (This also includes everything else published and

created by Stop Phone Scammers.) Raw video of this scam is available for law purposes.

Any hold music, outro music, or soundtracks used in this video (unless otherwise indicated) do not belong to Stop Phone Scammers and belong to their respected owners.

ON SCREEN: STOP PHONE SCAMMERS

MALE ANNOUNCER: (Inaudible) Stop Phone Scammers and we are back with a real video finally after a month of no scam-baiting, we're finally back with an actual legit real scam-baiting video. Thank God.

So in this video, I call a company called NTS IT Care. This company is a scam company as you'll see in this video. They create fake popups claiming that they're Microsoft technicians and stuff like that. That they're going to -- if you don't call them within five minutes, they're going to -- your computer is going to be disabled and your computer is infected with a virus when it really isn't. So it's a big scam. The whole thing -- the company is a scam and I'm going, as you'll see in this video.

Now, in the future, if you ever get a fake popup on your computer, you can hold control/shift/escape on your keyboard and that will bring up task

manager, and from task manager, you can close the fake popup by clicking on the web browser that it's in and clicking end task or end process, depending on what version of Windows you're running.

Other than that, I hope you guys enjoy the video and I will see you guys towards the end.

ON SCREEN: "NTS IT CARE"

Tech Support Scam

STOP PHONE SCAMMERS

(Phone ringing.)

RECORDING: Please continue to hold for the next available agent.

DAVID: Thank you for calling NTS. This is David. How may I help you today?

CONSUMER: Hi, I got a message on my computer that says my computer has been blocked with the error code 268D3 and it says my stuff is being stolen.

DAVID: It's been how long you are getting this problem?

CONSUMER: I just got it. I tried going to Google and then this thing came up.

DAVID: Is it a laptop or it's a desktop?

CONSUMER: It's a desktop.

DAVID: I didn't get here.

CONSUMER: It's a desktop.
DAVID: All right. And do you know which Window you got? Is it Windows 7, 8 or 10?
CONSUMER: I think it's Windows 8.
DAVID: Windows 8, all right. Have you made any changes on this computer? Did you download anything?
CONSUMER: No, not recently.
DAVID: All right, sir. First, I have to connect your computer to our service so that I can check what is the exact problem, okay?
CONSUMER: All right.
DAVID: All right. Do one thing. Have a look on the keyboard, very left bottom. Do you see Window key, the flag key?
CONSUMER: Yeah, yeah.
DAVID: All right. So you have to press the Windows and R at the same time.
CONSUMER: Okay. Something comes up that says, run, and it says, type the name of a program, folder, document or internet resource and Windows will open it for you.
DAVID: All right. Now, type in there, H as in Henry.
CONSUMER: All right.

DAVID: H as in Henry again, two times H.
CONSUMER: Mm-hmm.
DAVID: Now, give a single space.
CONSUMER: All right.
DAVID: H as in Henry again.
CONSUMER: Okay.
DAVID: Now, click on okay.
CONSUMER: All right. Something --
DAVID: Now, what do you see on the screen?
CONSUMER: It says, HTML help, and it says, this page cannot be displayed.
DAVID: All right. Make it full screen. Make it bigger.
CONSUMER: Okay.
DAVID: Now, at the very top left, do you see a yellow question mark?
CONSUMER: Yeah.
DAVID: Click on that.
CONSUMER: Okay, a little drop-down thing came up.
DAVID: Do you see jump to URL?
CONSUMER: Yeah, I see that.
DAVID: Click on that.
CONSUMER: Okay. Another box opened.
DAVID: All right. Now type in the www-dot.

CONSUMER: Okay.
DAVID: Support, S-U-P-P-O-R-T, support.
CONSUMER: Okay.
DAVID: Dot me, M as in Mike, E as in Edward.
CONSUMER: Okay.
DAVID: Then click okay.
CONSUMER: All right. All right.
DAVID: Now, what do you see on the screen?
CONSUMER: It's loading a page. It says, support connection, enter a six-digit code.
DAVID: All right. Your code is 901.
CONSUMER: Okay, 901.
DAVID: 442.
CONSUMER: Okay. Now I click the start download button?
DAVID: Yes.
CONSUMER: All right.
DAVID: Now what do you see?
CONSUMER: It's downloading something.
DAVID: Okay.
CONSUMER: Let's see. Oh, okay. It says -- all right. Something came up that says, NTS, and it says, connecting.
DAVID: Okay.

CONSUMER: I just clicked on the --
DAVID: Do you see any option like run?
CONSUMER: Yeah, I clicked on run.
DAVID: Do you have -- okay. All right. Now, click on okay. Hit okay.
CONSUMER: All right. Okay, I clicked okay. Oh, my screen went black.
DAVID: All right.
CONSUMER: Or my background.
DAVID: All right. Now do you see that I'm moving the cursor on the screen round and round?
CONSUMER: Oh, yeah, I see that.
DAVID: All right. So I'm connected. Just give me a moment. Let me check this program, okay?
CONSUMER: Okay. Yeah, this is what came up. I don't know -- you know, I don't know.
DAVID: Did you click any advertisements?
CONSUMER: No. All I did was try to go to Google and then this thing just came up and it -- I don't know. It took over basically.
DAVID: All right. And how old is your computer?
CONSUMER: It's about three years old maybe, something like that.
DAVID: Okay. Do you play online games?

CONSUMER: No.
DAVID: All right. I'm running a security scan and I will let you know what's the exact problem.
CONSUMER: Okay.
DAVID: May I know that who provides you internet? It's AT&T, Verizon, Comcast?
CONSUMER: I don't know. It's whatever the apartment has.
DAVID: Okay. Are you the only one who use this computer?
CONSUMER: Yeah.
DAVID: Okay.
(Pause.)
DAVID: All right. Now I want you to look on the screen. Do you see system configuration?
CONSUMER: Yeah, I see that.
DAVID: All right. These are the services provided by Microsoft, and if you check the status it says, running, stop, stop, stop, stop running, and then it's stopped. And if I go further, you're going to see there are a lot of services are not running on this computer.
CONSUMER: Oh, wow, okay. All right.
DAVID: And the most important thing, some of the network services are also not running. But

that could be a reason you are getting this problem. And here are some errors on this computer. That's why the services are not running. May I know that how do you protect this computer? I mean, do you have any anti-virus, any other security?

CONSUMER: Just whatever came with it.

DAVID: Do you remember the name?

CONSUMER: No, whatever -- whatever's on here. I don't know. I don't use this computer very often.

(Pause.)

DAVID: Is your computer slow?

CONSUMER: Um, not really, at least not that I could tell. Does it seem slow to you?

DAVID: It seems like it's working a little bit slow.

CONSUMER: Okay. Yeah, I don't -- I don't know. I've never really noticed.

(Pause.)

DAVID: All right. It's processing very slow. So in the meanwhile, let me provide you some of the information.

CONSUMER: Okay.

DAVID: All right. That's our toll-free number I'm typing on the screen. In case the line got

disconnected, you can dial this number and you can ask for the extension 303.

CONSUMER: Okay.

DAVID: And right now, you are connected with NTS IT Care.

(Pause.)

DAVID: All right. It's taking too much time, so let me tell you what we are going to do. First, we need to install some protections on this computer --

CONSUMER: Okay.

DAVID: -- because the network security is not running, the firewall. And we have to enable the services, which is stopped, and we have to clean the errors on this computer and hidden virus. So it will take some time, like 30 to 40 minutes. Will that be okay?

CONSUMER: Yeah, that's fine.

DAVID: All right. So we are going to block all the unwanted links and all the unwanted advertisements from the browser --

CONSUMER: Okay.

DAVID: -- so that this -- our ad blocker and clean up this computer. We are going to enable Microsoft services. And you told me you have an anti-

virus, right?

CONSUMER: Yeah, whatever came with it. I don't know.

DAVID: Because when you bought the computer, you will just get the anti-virus for one month or sometime it's for a year. If you don't have, you have to install the anti-virus on this computer because I don't see. So it will take, as I told you, 40 to 50 minutes, but there would be a nominal one-time charge for the security.

CONSUMER: Okay.

DAVID: It comes with the duration. It comes with one-year, two-year, and three-year. So you can choose any one of them. If you go with the one-year, technicians are going to install the one-year complete protection and you'll get getting the one-year support for this computer. So within one year, if you face any problem on this computer, that would be free of cost. So it will cost you 199.99.

CONSUMER: Okay.

DAVID: And if you go with the two years, you will be getting the two-year security plus two-year support for this computer, that is 299.99. And for the three-year, that is transferable one computer to another. So that will protect two computers and

you'll be getting the three-year security and three-year support.

CONSUMER: Okay.

DAVID: Including with all the various other devices like your printer, your router, your scanner, your tablet, your -- tablet. So this is for 49.99.

CONSUMER: All right.

DAVID: So you can choose any one of that, how long you want to go for it.

CONSUMER: Well, I think I'm going to go for three years because I really don't want this to happen again. You know what I mean?

DAVID: Do you have any other computer?

CONSUMER: No.

DAVID: All right. Okay. I need some of the details. Your name, your phone number, your -- do you have an email address?

CONSUMER: Yeah.

DAVID: All right. I want you to please type these details by yourself.

CONSUMER: Okay. See, I got to wait for...whoops.

(Pause.)

DAVID: All right. May I know that which card you're going to use for the payment, that would

be a Visa or Master?

CONSUMER: It's going to be a Mastercard.

DAVID: Okay. Could you please type the account numbers here, the expiration date, and the CVV?

CONSUMER: Yeah.

DAVID: Wait, just give me a moment. You're typing in the wrong --

CONSUMER: Oh, you moved it on me again.

DAVID: Just -- yeah. Here, remove it and then type on the left.

(Pause.)

DAVID: All right. Now, just give me a moment. Let me connect you to the billing department. He will generate an invoice and the agreement for the three years, okay?

CONSUMER: Okay.

DAVID: All right. Just give me a moment.

(Pause.)

ALLEN: Thank you for holding the line. This is Allen from the billing department. How are you today?

CONSUMER: Pretty good. How are you?

ALLEN: I'm perfectly fine, sir. Thank you for asking.

CONSUMER: Mm-hmm.

ALLEN: So you were talking to -- one of the technician here told me that you are going for three-year support, with network security, including McAfee on the computer, correct?

CONSUMER: Yep, that would be right.

ALLEN: Okay. So I'll do one thing. I'll go ahead and register (inaudible) that I need to open a verification page for you. So let me tell you one thing, the amount that you're paying, it will be coming in the name of NTS IT Service, Inc.

CONSUMER: Okay.

ALLEN: That's an independent service provider. We have a certified technician who will be working on the computer right now.

CONSUMER: Okay.

ALLEN: So each and every thing that will be done, it will be done in front of you. So just give me one minute. So let me go (inaudible) that, okay?

CONSUMER: Okay.

ALLEN: Thank you.

CONSUMER: Mm-hmm.

ALLEN: And I hope, sir, you understand the technician was working on the computer. He told me that it's three years of support and network security

(inaudible). If you have any kind of (inaudible) devices, that will be your cell phone, tablets (inaudible), those will be automatically covered for the next three years.

CONSUMER: Okay, all right.

ALLEN: Okay?

CONSUMER: All right, that sounds good.

ALLEN: Perfect. So just give me one minute. Let me open the verification page for you.

(Pause.)

ALLEN: Okay, just give me one minute, sir.

CONSUMER: Okay.

(Pause.)

ALLEN: And, sir, in this, let me tell you one thing, the amount that you're paying, it will include a one-time of (inaudible) and technician fee. So the total amount that will be coming is $499.99 with state tax and technician fees, okay?

CONSUMER: Okay, all right.

ALLEN: And that includes McAfee on the computer. As of now, I was trying to open a verification page, but it's not opening. So I'll do one thing.

CONSUMER: Hold on.

ALLEN: I'll show you the authorization on

the (inaudible). Just give me --

CONSUMER: Well, I think -- that's all right. I think you had it on there twice. Just a second.

ALLEN: Yeah, just leave that thing, sir.

CONSUMER: Hold on. I want to see if I can fix it real quick. Or not.

(Pause.)

ALLEN: Okay. Let me do one thing. Let me show you the authorization (inaudible) on the desktop. Give me one minute.

CONSUMER: Okay.

ALLEN: So let me tell you one thing. The amount that you're paying is $499.99, including McAfee in your computer for the next three years. There is the authorization which is written here with, which it says, I, Richard, would like to place an order to NTS IT help desk for below-mentioned product and services. I authorize NTS IT help desk (independent service provider) to charge Mastercard ending with 1429 for an amount of $499.99.

Amount of 499.99 will be collected in three parts. That will be 150 will be charged for software installation, computer optimization and tune-up; 150 will be charged toward (inaudible) anti-virus software

installation, computer optimization and tune-up.

CONSUMER: I think it opened.

ALLEN: And also $199.99 will be charged -- excuse me?

CONSUMER: I said I think it opened.

ALLEN: That's okay. Just leave that thing, sir. As of now, this is the authorization. So it says that 199.99 will be charged for three years of support for one Windows computer and peripherals for three years. You understand that's only a one-time charge and a nonrenewable agreement and it will appear on the card statement under the name of NTS IT Service, Inc. Okay?

CONSUMER: Mm-hmm.

ALLEN: Okay. So I'll do one thing (inaudible) information for you and our technician who will be working on your computer will be taking this authorization. So just please be on and let me register you right now, okay?

CONSUMER: Okay.

ALLEN: Thank you, sir.

CONSUMER: Mm-hmm.

(Pause. Music playing.)

ALLEN: Hello?

CONSUMER: Hello.

ALLEN: Yeah, sir. Can you do one thing? Can you just go ahead and type your card number here by yourself once again?

CONSUMER: Yeah, just a second. I got to get it back out.

ALLEN: Just type your card number. And do you have a sufficient balance on your card because the previous number that you have given us, it's saying that this card is not in process.

CONSUMER: Really?

ALLEN: Yeah.

CONSUMER: Hmm. Well...

ALLEN: Do you have any other card apart from this card or you still want to use this card?

CONSUMER: No, I don't have any other card.

ALLEN: Okay. Do one thing, tell me the card number then.

CONSUMER: Okay, just a second.

(Pause.)

CONSUMER: Oh, my bad.

ALLEN: Okay, go ahead and type it.

CONSUMER: Three, six...

(Pause.)

CONSUMER: Sorry. The card doesn't work on scammers. It's a fake card. So I just should

probably let you know that right now you've been recorded and you're currently being recorded, so you might want to watch what you say and do over the next period of time.

ALLEN: Oh, I can see that, sir. That's what we were trying to check with you --

CONSUMER: Yeah, I'm sure, yeah, yeah.

ALLEN: (Inaudible).

CONSUMER: Mm-hmm.

ALLEN: Exactly like you.

CONSUMER: So anyway, do you want to explain why your fake popup -- why you're trying to scam people?

(Pause. Music playing.)

MALE ANNOUNCER: Hmm.

(Pause.)

MALE ANNOUNCER: Well, as you guys can clearly see, nothing but a scam. The fake popup was fake. There is nothing wrong with my computer. He lied about the stopped services claiming that they need to be running when they really don't need to be running. They're perfectly normal the way they are. He wanted to -- he wanted my card information through an unsecured way using Notepad. That doesn't make sense. He said there's viruses on my computer without

doing any legitimate check. He didn't do any legitimate check for anything like that.

And it looks like we booted back in safe mode.

(Pause.)

MALE ANNOUNCER: Anyway, like I was saying, nothing but a scam. He lied about the fake popup. The popup was fake. There was nothing wrong with the computer. He lied about the stop services, claimed that I needed security without doing a legitimate check to see that Comodo was obviously running down there in the task bar. He didn't check that. He didn't -- I didn't need any of those securities. I didn't need anything like that. He didn't bother checking. And he didn't know a legitimate check to see if there was a virus on this computer, because there isn't. It is a perfectly clean virtual machine.

So anyway, another company exposed. Do not call this company. NTS IT Care is what the company is called. So do not call the company. It's a scam. Anyway, other than that, thank you guys for watching this video. It's great to be back scam-baiting again after a month off. So it's great to be back. So anyway, thank you guys for watching this video and I

will see you guys in the next video.

(Music playing.)

(The video was concluded.)

CERTIFICATE OF TRANSCRIPTIONIST

I, Elizabeth M. Farrell, do hereby certify that the foregoing proceedings and/or conversations were transcribed by me via CD, videotape, audiotape or digital recording, and reduced to typewriting under my supervision; that I had no role in the recording of this material; and that it has been transcribed to the best of my ability given the quality and clarity of the recording media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

DATE: 11/4/2019

Elizabeth M. Farrell

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FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF ALEXANDRIA DEJESUS IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF ALEXANDRIA DEJESUS

1. My name is Alexandria DeJesus and I reside in Ohio. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. In July 2016, I needed the Google Chrome web browser for my job so I downloaded the program from the Internet. Soon after I downloaded Google Chrome, a pop-up message appeared on my computer screen. The pop-up looked like an official alert (box with lots of text) and I believed it was from Google. The pop-up stated that my computer was infected with a virus and told me to call a phone number to solve the problem.

3. After the pop-up appeared, most of the programs on my computer were disabled. I could not close the pop-up or fully access files on my computer. I turned my computer off and on, but the pop-up message remained and many of my computer functions remained frozen. Due to the pop-up message and my inability to access most of my computer, I was worried that my computer had a virus. I had recently started a new job and could not afford to have a virus on my computer.

4. I called the phone number listed on the pop-up and hoped that Google could remove the virus from my computer. The man who answered said he could remove the virus for free. He also offered me a virus protection service/membership. I thought I was dealing with an affiliate of Google because the pop-up appeared soon after I downloaded Google Chrome.

5. I explained that I could not afford an expensive virus protection service. The man then said he would transfer me his "manager" to approve a special payment plan. The next person I spoke with identified himself as Jagmeet Virk. Mr. Virk said he could approve me for a special deal – 2-years of computer support services for $199.99 plus a $49.99 renewal. I was worried about getting another virus on my computer so I decided to purchase the membership. Mr. Virk then instructed me to send an email to SUPPORT@ntsitcare.com and authorize two payments to NTS IT Care, Inc. He told me exactly what to say in the email to SUPPORT@ntsitcare.com. My understanding was that I could call NTS anytime for two years and someone associated with NTS would help me with any computer problem. Because Google is a large company, I assumed it had affiliates who assisted with virus protection services.

6. After Mr. Virk approved my payment plan, he transferred me to a person who identified herself as "Tammy ID#505." Tammy told me that my plan covered services related to my computer, as well as other electronics, like my phone, Kindle, or modem. Tammy said she needed to access my computer and sent me an email with a link that allowed her to remotely control my machine. She opened random files on my computer and said she was "cleaning though it" and "clearing out the virus." The pop-up disappeared and my computer appeared to work again.

7. Tammy said my virus protection membership included one computer check-up per month and installed her company's app on my computer. Included in the folder that Tammy added to my computer was a document describing her company's services. The document included the following promise: "OUR CERTIFIED TECHNICIANS WILL WORK WITH YOU VIA REMOTE HELPDESK SOFTWARE TO FIX YOUR ISSUES AND ENSURE THAT YOUR COMPUTER IS RUNNING WITHOUT ANY ERRORS." I did not notice language at the bottom of the services list that said "DISCLAIMER" because it was in small print and hard to read. A true and correct copy of the document Tammy added to my computer that listed NTS's services is attached as **DeJesus Attachment A.**

8. On July 29, 2016, at 7:56pm, I followed Mr. Virk's instructions and sent an email to SUPPORT@ntsitcare.com authorizing NTS IT Care to (1) immediately charge me $199 for a 1-year subscription for technical support and (2) charge me an additional $49.99 the following week to upgrade my subscription for 2-years. A true and correct copy of my July 29, 2016, 7:56pm email to NTS, with my underlined notations, is attached as **DeJesus Attachment B**. My personal information has been redacted from all attachments to my declaration.

9. On July 29, 2016, at 8:01pm, I received an email from "Jagmeet Virk" at jims@ntsitcare.com. The subject line of the email read "Transaction Receipt from NTS IT Care Inc. for $0.99 (USD)." The email appeared to be a billing notice from NTS It Care for a "Test Transaction." The email listed the following contact information for NTS: "Merchant Contact Information, NTS It Care, Inc., Milpitas, CA 95035, US, jims@ntsitcare.com, TOLL FREE: 877-490-6709 / 866-763-1760, Support Email: - support@ntsitcare.com . . . company website

(www.ntsitcare.com)." A true and correct copy of the July 29, 2016, 8:01pm email that I received from NTS is attached as **DeJesus Attachment C**.

10. On July 29, 2016, at 8:02pm, I received another email from NTS IT Care and Jagmeet Virk. This email appeared to be an invoice for $199 for "One Time Fix with 1 year extended software support warranty on 1 computer with peripheral devices." A true and correct copy of the July 29, 2016, 8:02pm email that I received from NTS is attached as **DeJesus Attachment D**.

11. On August 5, 2016, I received an email from "NTS Support Team" stated the company was going to charge me $49.99. A true and correct copy of the August 5, 2016 email that I received from NTS is attached as **DeJesus Attachment E**.

12. On August 5, 2016, I received an email from NTS IT Care and Jagmeet Virk. This email was an invoice for $49.99 with the description "In Continuation to the Previous Invoice NTSIT0729-001 (One Time Fix with 2 years extended software support warranty on 1 computer with peripheral devices)." A true and correct copy of the August 5, 2016 email that I received from NTS is attached as **DeJesus Attachment F**.

13. After I signed up for NTS's services, people claiming to be the company's agents called me numerous times purporting to offer assistance. However, I seemed to know more about computers then they did. For example, one time a false NTS agent called me and said I needed more RAM (computer memory) and that he could add RAM to my computer remotely. I know RAM is hardware that needs to be physically installed on a computer, and was not something he could do remotely. Sometimes people claiming to be NTS called me three times a day. It was such a nuisance that I stopped answering my phone and ultimately had to block 16 numbers that the fake NTS was using to call me. I was very irritated because NTS was supposed to be fighting malware, and yet did nothing to stop annoying calls. I didn't understand how a company that presents itself to fight in the war of tech viruses, does nothing to discover the persons that were harassing and stealing from their customers. I did not plan to give NTS any more money.

14. Over the next year, I did not have a lot of computer problems so only called NTS a few times for assistance.

15. On August 24, 2017, I realized I hadn't had my computer cleaned in a while. I figured I should put NTS to use, because I had already paid for two years of service, which wasn't very useful. I could have just purchased virus protection software from a store. I called NTS to clean up my computer. The agent I dealt with identified himself as "Dennis" and said my membership had expired. He said I had to renew my service in order for him to proceed. I recall thinking that they were not providing Google-level customer service. In fact, he did not even try to look up my account number. I found this lack of basic customer service very suspicious. All the people I dealt with at NTS – including the initial sales agent, Jagmeet Virk, Tammy, and Dennis – had near middle eastern accents, possibly Indian.

16. On August 24, 2017, I filed a complaint against NTS with the Better Business Bureau ("BBB"). A true and correct copy of the "Complaint Activity Report" that the BBB sent me is attached as **DeJesus Attachment G**. My complaint to the BBB stated, "Honor the contract issue[d] to me by Jagmeet Virk. I still have 1 more year. Or give back the $49.99 I paid to upgrade." According to the Complaint Activity Report, the BBB notified NTS of my complaint on August 28, 2017. On September 7, 2017, the BBB sent me the following response from NTS: "we would like to inform and apologies for this inadvertent error on our part . . . we would like to offer a 3 month extension [of our service]." I agreed to accept this resolution, but included the following response to NTS: "I just wanted the contract to be up help, I was upset that the person I talked to didn't even ask for the transaction numbers . . . ."

17. In 2017, a colleague at my work told me that NTS was likely a scam, which made sense to me. I filed a complaint about NTS with Google and posted a complaint on Facebook so other consumers would know that NTS was a scam. NTS held my computer hostage with a fake pop-up claiming I had a virus and then tricked me into giving the company $250.

18. I declare under penalty of perjury that the foregoing is true and correct. Executed on August 15, 2019, in Ohio.

Alexandria DeJesus

Alexandria DeJesus

DeJesus Attachment A

NTS IT CARE

Get Support.

WE ARE ONLY A PHONE CALL AWAY

OUR CERTIFIED TECHNICIANS WILL WORK WITH YOU VIA REMOTE HELPDESK SOFTWARE TO FIX YOUR ISSUES AND ENSURE THAT YOUR COMPUTER IS RUNNING WITHOUT ANY ERRORS.

24*7 **866-763-1760**
877-490-6709

Support Email ID	support@ntsitcare.com
Billing email ID	billing@ntsitcare.com
Website	www.ntsitcare.com

SERVICES OFFERED

1. Printer/Scanner Support.
2. Router Support.
3. Firewall Support.
4. Browser Support.
5. Complete Security Services.
6. Email Assistance.
7. Operating system (Windows / Mac) Support / Upgrade Assistance.
8. Accounting software support.
9. One-Stop-Destination for all software requirements.
10. On Demand Premium Assistance.

IMPORTANT UPDATE

"WE DON'T ACCEPT OR ASK FOR WESTERN UNION MONEY TRANSFER / PAYPAL / GREENDOT CARD"
"NTS WILL NEVER CALL YOU FOR ANY POSSIBLE ISSUES UNLESS WE RECEIVE A WRITTEN REQUEST VIA EMAIL"

DISCLAIMER

NTS IT Care is an independent provider of remote technical support services for software and computer peripherals. We provide solutions and services for a wide range of products. NTS IT Care has no affiliation with any third-party companies unless such relationship is expressly specified. For permitted use and

DeJesus Attachment B

Gmail **Alex DeJesus** <[redacted]>

AUTHORIZATION EMAIL

2 messages

Alex DeJesus <[redacted]> Fri, Jul 29, 2016 at 7:56 PM
To: SUPPORT@ntsitcare.com

I Alexandria DeJesus ,authorize NTS IT CARE (Independent Support Provider) to charge my MASTER CARD ending with [redacted] for the amount of US $199.99 today for a 1 YEAR OF TECHNICAL SUPPORT & SOFTWARE INSTALLATION for 1 MAC computer along with peripherals support. and on i.e 05 August 2016 i will paying $49.99 using the same Master card in order to upgrade my support to 2 years for the same MAC COMPUTER.

I understand that its a one time charge and, it will appear in my card statement under the name of NTS IT CARE.

Regards,
Alexandria DeJesus

DeJesus Attachment C

Gmail Alex DeJesus <[redacted]>

Transaction Receipt from NTS IT Care Inc. for $0.99 (USD)

1 message

Auto-Receipt <noreply@mail.authorize.net> Fri, Jul 29, 2016 at 8:01 PM
Reply-To: Jagmeet Virk <jims@ntsitcare.com>
To: Alexandria DeJesus <[redacted]>

NTS ITCARE INC. (WWW.NTSITCARE.COM) TOLL FREE No 1-877-490-6709 /1-866 763 1760

Order Information

Description:	Test Transaction.
Invoice Number	NTSIT0729-011
Customer ID	NTSIT0729-011

Billing Information
Alexandria DeJesus
[redacted]
USA
[redacted]

Shipping Information

Total: $0.99 (USD)

Payment Information

Date/Time:	29-Jul-2016 17:01:08 PDT
Transaction ID:	20081502807
Payment Method:	MasterCard xxxx[redacted]
Transaction Type:	Purchase
Auth Code:	H90274

Merchant Contact Information
NTS IT Care Inc.
Milpitas, CA 95035
US
jims@ntsitcare.com
TOLL FREE: 877-490-6709 / 866-763-1760 Support Email:- support@ntsitcare.com The services offered by NTS ITCARE INC. are as per the Terms and Conditions, Refund Policy and Privacy Policy on the company website(WWW.NTSITCARE.COM).

DeJesus Attachment D

Gmail Alex DeJesus <[redacted]>

Transaction Receipt from NTS IT Care Inc. for $199.00 (USD)

1 message

Auto-Receipt <noreply@mail.authorize.net> Fri, Jul 29, 2016 at 8:02 PM
Reply-To: Jagmeet Virk <jims@ntsitcare.com>
To: Alexandria DeJesus <[redacted]>

NTS ITCARE INC. (WWW.NTSITCARE.COM) TOLL FREE No 1-877-490-6709 /1-866 763 1760

Order Information

Description:	One Time Fix with 1 year extended software support warranty on 1 computer with peripheral devices.
Invoice Number	NTSIT0729 011
Customer ID	NTSIT0729-011

Billing Information
Alexandria DeJesus
[redacted]
United States
[redacted]

Shipping Information

Total: $199.00 (USD)

Payment Information

Date/Time:	29-Jul-2016 17:02:49 PDT
Transaction ID:	20081504767
Payment Method:	MasterCard xxx[redacted]
Transaction Type:	Purchase
Auth Code:	H10215

Merchant Contact Information
NTS IT Care Inc.
Milpitas, CA 95035
US
jims@ntsitcare.com
TOLL FREE: 877-490-6709 / 866-763-1760 Support Email: support@ntsitcare.com The services offered by NTS ITCARE INC. are as per the Terms and Conditions, Refund Policy and Privacy Policy on the company website(WWW.NTSITCARE.COM).

DeJesus Attachment E

Gmail

Alex DeJesus <[redacted]>

NTS IT CARE <support@ntsitcare.com> Fri, Aug 5, 2016 at 10:42 AM
To: Alex DeJesus <[redacted]>

Dear Alexandria DeJesus,

Good Day!

As per your mail below, we are going ahead and charging your card today with an amount of $49.99

Please feel free to call/ reply for any further clarification.

Thanks & Regards,

NTS Support Team.

DeJesus Attachment F

Gmail **Alex DeJesus** <[redacted]>

Transaction Receipt from NTS IT Care Inc. for $49.99 (USD)

1 message

Auto-Receipt <noreply@mail.authorize.net> Fri, Aug 5, 2016 at 7:13 PM
Reply To: Jagmeet Virk <jims@ntsitcare.com>
To: Alexandria DeJesus <[redacted]>

NTS ITCARE INC. (WWW.NTSITCARE.COM) TOLL FREE No 1-877-490-6709 /1-866 763 1760

Order Information

Description: In Continuation to the Previous Invoice NTSIT0729-011 (One Time Fix with 2 years extended software support warranty on 1 computer with peripheral devices)

Invoice Number NTSIT0729-011(A)

Customer ID NTSIT0729-011(A)

Billing Information
Alexandria DeJesus
[redacted]
United States
[redacted]

Shipping Information

Total: $49.99 (USD)

Payment Information

Date/Time:	5-Aug-2016 16:13:48 PDT
Transaction ID:	20103282708
Payment Method:	MasterCard xxxx[redacted]
Transaction Type:	Purchase
Auth Code:	H86413

Merchant Contact Information
NTS IT Care Inc.
Milpitas, CA 95035
US
jims@ntsitcare.com
TOLL FREE: 877-490-6709 / 866-763-1760 Support Email:- support@ntsitcare.com The services offered by NTS ITCARE INC. are as per the Terms and Conditions, Refund Policy and Privacy Policy on the company website(WWW.NTSITCARE.COM).

DeJesus Attachment G

COMPLAINT ACTIVITY REPORT Case # 569659

BBB of Los Angeles and Silicon Valley

Consumer Info: De Jesus, Alexandria
[redacted]

Business Info: NTS IT Care Inc

877 490-6709

Location involved: (Same as above)

Consumer's Original Complaint:
The contract I was offered by NTS it Care Independence support provider was not honored for the purchase that I made I was taken advantage of.
Transaction carried out by Jagmeet Virk jims@ntsitcare.com July 29 2016 IN: NTSIT0729-011. Cust id: ntsit0729-011
Trans id: 20081502807 $0.99
07/20/16 Trans id: 20081504767 $199.00
08/05/16 Trans id: 20103282708 $49.99

" I Alexandria DeJesus off the rise NTS it Care Independence support provider to charge my Mastercard ending with [redacted] the amount of U.S $199.99 today for a one year of technical support and software installation for one Mac computer along with peripherals support. And on i.e 05-August-2016 I will Payne $49.99 using the same MasterCard in order to upgrade my support to two years for the same Mac computer I understand that it's a one-time charge and it will appear in my credit card statement under the name of NTS it care

Consumer's Desired Resolution:
Honor the contract issue to me by Jagmeet Virk. I still have 1 more year. Or give back the $49.99 I paid to upgrade. I have the proof.

BBB Processing

08/24/2017	**web**	**BBB**	Case Received by BBB
08/28/2017	**RN**	**BBB**	Case Reviewed by BBB
08/28/2017	**Otto**	**EMAIL**	Send Acknowledgement to Consumer
08/28/2017	**Otto**	**EMAIL**	Notify Business of Dispute
09/07/2017	**WEB**	**BBB**	RECEIVE BUSINESS RESPONSE : Dear Alexandria, At the onset we would like to inform and apologies for this inadvertent error on our part. We have checked our records and found that you service is still active with us and the same expires on July 27 2018. Please feel to call for any issue related to your computer 24X7 at our below mentioned customer care numbers. As a customer centric organization, we would like to offer a 3 month service extension hence your new expiration date is October 27 2018. For any further clarifications you can always call or write to us at support@ntsitcare.com Thank you, NTS Support Team 844-208-2608
09/09/2017		**BBB**	MORE INFO RECEIVED FROM THE CONSUMER : ***Document Attached***
09/11/2017	**RN**	**EMAIL**	Forward Business response to Consumer
09/20/2017	**WEB**	**BBB**	DISPUTE RESOLVED- WITH LETTER : (The consumer indicated he/she ACCEPTED the response from the business.) I just wanted the contract to be up held. I was upset that the person I talked to didn't even ask for the transaction numbers for the proof that I had, but now everything has been set straight.
09/21/2017	**OttO**	**EMAIL**	Inform Business - Case Closed RESOLVED
09/21/2017	**OttO**	**BBB**	Case Closed RESOLVED
09/26/2017	**TDT**	**EMAIL**	Send Consumer Survey

ALDEN F. ABBOTT
General Counsel

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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF JOANNE FADROWSKI IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF JOANNE FADROWSKI

1. My name is Joanne Fadrowski and I reside in New York. I am a 78-year old widow. The following statements are within my personal knowledge.

2. In 2018, I was on my computer when a loud pop-up message appeared and my computer froze. The pop-up said my computer had a virus and instructed me not to shut off the machine. I could not do anything on my computer so I called the phone number on the pop-up for help. A man with an Indian accent answered the phone and had me click on something to give him access to my computer. He said my computer had bugs and that I needed to update my operating system. He said he would clean off harmful stuff from my computer and transferred me to another man. The second man said I had to pay $349.99 for a 3-year service plan to resolve the virus. I had no choice and agreed to pay him. My credit card statement soon showed a $349.99 payment to NTS IT Care ("NTS").

3. I soon realized that the pop-up message was false and that NTS was a scam. My daughter called NTS on my behalf and asked for a refund. The representatives she spoke with were very rude and refused to give me a refund.

4. On November 14, 2018, I filed a complaint against NTS with the Better Business Bureau ("BBB"). The following statements accurately depict my complaint to the BBB, and correspondence with NTS through the BBB.

NATURE OF DISPUTE:

> Received a pop up on computer locking me out and claiming I had a virus. Claimed I needed a One Time Fix on MAC computer . . . 3 yr. Service Plan - $349.99; Paid by VISA.
>
> I had given up on settling this problem, but have noticed all the recent complaints towards this company. I am a 78 yr. widow who received a pop up on my MAC computer locking me out and claiming that I had a virus, to call a certain phone number, etc. Very high tech tactics to convince me I had to purchase this extended software support warranty to resolve the 'virus??'

I am not computer savvy!! My daughter tried to call the company back for me after I realized this was not legitimate and had to end up yelling at the sales rep. stating I did not want this 'Plan' with no response. I had contacted my Credit Card Company and my Attorney to no avail. I could not prove the SCAM!!!! Very upsetting to be taken advantage of!!

DESIRED RESOLUTION:

I would definitely seek a total refund as I do not need this service or intend to use it at all!! I am not a person to be on the computer for even 1hr. a week.

BUSINESS RESPONSE:

Dear Joanne,

We would like to inform you that we did received a call from your daughter on November 15th 2018 in order to cancel the services. While speaking to her the call got disconnected and we tried calling her numerous times however she did not answer the phone.

As you have mentioned on your complaint that 'I could not prove the SCAM!!!!' we would like to inform that we are not running any scam here. Your computer support is active with us for 3 years which will end on November 13th 2021.

If we got no response from you and your daughter we would have gone ahead and cancelled your services in the month of November itself. We regret to inform that we cannot cancel the subscription now.Feel free to call us on our toll free number or email us at support@ntsitcare.com for further discussion.

Thank you,

NTS Support Team

8446599899

CONSUMER REBUTTAL TO BUSINESS RESPONSE:

I do not accept the response from NTS IT Care Inc. They are stating this is not a Scam! However, the Pop Up would definitely be from their company as well as instructions to call 'their phone number!!!' Why would someone call their particular number if it was not planned!!! Yes, I do have a 3 yr. computer support contract that was manipulated by their Techs. It is plain to see how many others have made this same Complaint!! Soliciting money or business this way is completely unacceptable!!

5. To date, NTS still has not provided me with a refund. However, to me it is not about the money, but about rather stopping companies like NTS from scamming people.

6. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 5, 2019, in New York.

Joanne Fadrowski

Joanne Fadrowski

ALDEN F. ABBOTT
General Counsel

RONNIE SOLOMON, Cal. Bar No. 284923
SARAH SCHROEDER, Cal. Bar No. 221528
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF PATRICIA HICKEY IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF PATRICIA HICKEY

1. My name is Patricia Hickey and I reside in Maryland. I am a retired police sergeant in my 70s. The following statements are within my personal knowledge.

2. In early October 2017, I was reading a news article on Facebook and clicked on a blue hyperlink at the bottom of the page that said something like "click here for further reading." Shortly after I clicked the link, my computer screen turned red and orange, and a pop-up appeared on the screen stating that my computer was infected with malware. The pop-up inferred that the alert was associated with Microsoft and instructed me to call a phone number to fix my computer. The pop-up box contained a phone number for NTS and the words that it was 'authorized by Microsoft to do repair work on Microsoft products.

3. I tried everything I could to get rid of the pop-up, but I could not close it or open files on my computer. Nor could I turn off the computer by pressing the power button on the machine. I was desperate so I called the phone number listed on the pop-up. A man with a foreign accent answered the phone and said his company, NTS IT Care ("NTS"), needed access to my computer to fix the problem. I gave the man remote access to my computer and he said my computer had malware. He also said NTS was under contract with Microsoft to perform this type of computer security work. He said he could fix the problem for $169.99 and installed some programs on my computer. The NTS IT Care representative stated these programs were to provide internet security for my computer. I did not want these programs. I just wanted control of my computer returned to me.

4. My computer was hijacked and I could not even turn it off, so I paid the man to release it. After I gave him my credit card information, he released control of my computer.

5. After I regained control of my computer, I immediately contacted Visa to block the $169.99 payment to NTS. I also contacted a legitimate technical support firm to remove NTS's programs from my computer. For several days, NTS kept calling me demanding that I take the block off the Visa charge. I demanded they cancel their "services" to my computer and give up on their attempts to charge me.

6. On October 9, 2017, I received a fake email that appeared to be from me to NTS. A true and correct copy of the October 9, 2017 email, with my personal information redacted and my handwritten notes, is attached as **Hickey Attachment A**. As I noted on Hickey Attachment A, the email was bogus and I did not sent it to NTS. Someone from NTS manufactured the email and sent it out using my email account.

7. Despite my attempts to block NTS's charge to my Visa card, on October 9, 2017 NTS's charge went through. A true and correct copy of my Visa statement showing a $169.99 charge from "NTS IT CARE INC" on October 9, 2017 is attached as **Hickey Attachment B**. The statement also notes "$169.99 in dispute pending compliance with resolution procedure." Visa denied my chargeback request and let the $169.99 transaction to NTS proceed because Visa said I authorized the payment.

8. On October 10, 2017, I filed a complaint against NTS with the Federal Trade Commission. A true and correct copy of my October 10, 2017 complaint to the FTC is attached as **Hickey Attachment C**. My complaint stated the following:

> "My computer was seized remotely. A popup box appeared saying the computer operating system was in jeopardy. The company name and phone number were given. Info purported that it was authorized by Microsoft to do repair work remotely. The company rep. said [t]he same thing. I could not back the computer out of the page which had appeared. I could not shut down the computer with key board command. Rep. told me he could 'fix' the computer and protect it from virus/malware for a year for $169.99 which I finally authorized via credit card. Checking with Microsoft and others after dealing with these pirates, I found that NTS is a company which specializes in scams. I have had a lock put on my bank and credit card accounts and have informed the bank that the $169.00 fee is fraudulent."

9. On October 11, 2017, NTS offered to "refund" $100 of my $169.99 payment if I would remove the block on the Visa charge. I told the NTS representative to deal with the bank and leave me alone.

10. On October 12, 2017, NTS contacted me again and promised to "refund" the full $169.99 if I would release the block on the Visa charge. I refused. I told the representative to deal with my bank. I have put a block on the email to keep NTS from contacting me. I also received a phone call, on or about October 12, 2017, where a NTS representative claimed NTS was a Microsoft authorized firm.

11. On October 23, 2017, I filed a complaint against NTS with the Better Business Bureau ("BBB"), which stated:

> NATURE OF DISPUTE: Received a popup box on my computer saying my computer was attacked with a virus. Directed to contact NTS for help. NTS inferred Microsoft authorized. 10/09/17 control of computer seized by NTS because I 'clicked' on the wrong link while reading a news article on Facebook. A popup box appeared directing me to contact NTS to get control of computer back. I was unable to back out of the page or turn off the computer. Popup box contained a phone number for NTS and the words that it was 'authorized by Microsoft' to do repair work on Microsoft products. NTS charged me $169.99 to get control of computer back. NTS alleged my computer had the Zeus virus and placed four different programs on my computer which allegedly protected against virus, malware, etc. I did not need this as I have programs from Norton.
> I protested this but was told [] the only way NTS would 'fix' my computer was by agreeing to use their products. I paid. Then as soon as I got control of my computer, I put a block on the Visa charge via my bank and contacted a legit. firm to remove NTS programs from my computer. I filed a complaint against NTS with my bank and the FTC. For several days, NTS kept contacting me via phone and computer demanding I take the block off the Visa charge. I demanded they cancel their 'services' to my computer and give up on their attempts to charge me. On 10/11/17 NTS offered to 'refund' $100 of my $169.99 if I would remove

> the block on the Visa charge. I told NTS rep. to deal with the bank and leave me alone. On 10/12/17, NTS rep. contacted me again and promised to 'refund' the full $169.99 if I would release the block on the Visa account. I refused. I told the rep. to deal with my bank. I have put a block on the email to keep them from contacting me. I also received a phone call, on or about 10/12/17, which is on my voice mail, where a NTS rep. claimed to be a Microsoft authorized firm.
>
> DESIRED RESOLUTION: This 'company', which is incorporated in California, needs to stop pirating people's computers and coercing payment for alleged services. Microsoft should sue them for invoking the name 'Microsoft.' I don't know what BBB can do about this except put out more information about these scammers."

Last year I deleted the voicemail from NTS because I did not expect anyone to follow-up on my complaint.

12. On October 30, 2017, I received an email from NTS with the false statement that "the required work on you PC/ Laptop was done as per your satisfaction." I sent NTS the following reply: "Leave me alone. I do not wish to do business with you thieves at all. You did NOT do work satisfactorily for me. You bastards [are] pirated and liars. NEVER contact me again by email or by phone. A true and correct copy of the October 30, 2017 email I received from NTS and my response, with my personal information redacted, is attached as **Hickey Attachment D**.

13. On November 5, 2017, I filed a follow-up complaint with the FTC. A true and correct copy of my November 5, 2017 complaint to the FTC is attached as **Hickey Attachment E**. My complaint stated the following:

> "This is a follow up to a complaint I filed with FTC on 10/10/2017. It was about a ransomware scheme by NTS IT Care, Inc. in which NTS was able to seize control of my computer and refused to release it. A popup box on my computer screen directed me to call NTS which claimed to be 'authorized' by

Microsoft to do computer repairs. NTS refused to release control of the computer unless I paid NTS $169.99 to download their computer 'security' software. After being coerced into agreeing to purchase NTS 'services' using my Bank of America Visa card, I immediately notified Bank of America that I believed NTS was running a computer scam. Bank of America immediately put a hold on paying NTS. Over the next four days I received a series of emails and phone calls from NTS where NTS employees attempted to convince me to cancel the complaint to Bank of Amer. On advice from Bank of Amer. Visa I refused. On 10/12/2017, an NTS employee contacted me [sic] via phone. This guy, called 'Michael', told me NTS would refund $100 to me if I would cancel the complaint to Bank of Am. and let the Visa charge go through. I refused. The next day there was another phone call from NTS employee 'Michael' where he said that I could get the whole $169 refunded if I would only cancel the complaint to Bank of Amer. Visa and allow the charge to go through. Again, I refused. NTS also sent me an email with a copy of an email allegedly from me purporting that their services were satisfactory. That was [] bogus. I never sent that to NTS. These people are liars and thieves. To stop the emails and phone calls, I contacted [redacted], which handles my email, and declared NTS contacts 'spam.' I have put a 'stop' on my phone to prevent NTS operatives from calling my home."

14. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 21, 2019, in Maryland.

Patricia Hickey

Patricia Hickey

Hickey Attachment A

Feedback For Email

From: Pat [redacted]
To: Support <Support@ntsitcare.com>
Date: Mon, Oct 9, 2017 5:54 pm

Dear support team,

Hi
i checked my computer everything working fine.Please close the ticket which is raised for me today.

Regards
Patricia Hickey

This email is bogus.
I did not send it.
Somehow NTS manufactured
it and sent it out.

P. A. Hickey
10/11/2019

Hickey Attachment A
FTC-TRO-0431

Hickey Attachment B

BankAmericard | Power Rewards

Visa Signature®

Bank of America

Customer Service Information:
www.bankofamerica.com
1.800.421.2110
TTY: 1.800.345.3178
Mail billing inquiries to:
Bank of America
P.O. Box 982234
El Paso TX 79998-2234
Mail payment to:
Bank of America
P.O. Box 15019
Wilmington DE 19886-5019

PATRICIA A HICKEY
[redacted]

September 16 - October 15, 2017
Account [redacted]

Account Summary

Previous Balance	[redacted]
Payments and Other Credits	
Purchases and Adjustments	
Fees Charged	
Interest Charged	
New Balance Total	
Total Credit Line	
Total Credit Available	
Cash Credit Line	
Portion of Credit Available for Cash	
Statement Closing Date	
Days in Billing Cycle	

Payment Information

New Balance Total	[redacted]
Current Payment Due	
Total Minimum Payment Due	
Payment Due Date	

Late Payment Warning: If we do not receive your Total Minimum Payment by the date listed above, you may have to pay a late fee of up to **$38.00** and your APRs may be increased up to the Penalty APR of **29.99%**.
Total Minimum Payment Warning: If you make only the Total Minimum Payment each period, you will pay more in interest and it will take you longer to pay off your balance. For example:

If you make no additional charges using this card and each month you pay	You will payoff the balance shown on this statement in about	And you will end up paying an estimated total of
Only the Total Minimum Payment	15 years	$6,950.00
$123.00	36 months	$4,428.00 (Savings = $2,522.00)

If you would like information about credit counseling services, call 866.300.5238.

15 [redacted]

BANK OF AMERICA
P.O. BOX 15019
WILMINGTON DE 19886-5019

Account Num [redacted]

New Balance Total	[redacted]
Total Minimum Payment Due	
Payment Due Date	11/12/2017

PATRICIA A HICKEY
[redacted]

Enter payment amount $

☐ *Check here for a change of mailing address or phone numbers. Please provide all corrections on the reverse side.*

Mail this coupon along with your check payable to: Bank of America

[redacted]

PATRICIA A HICKEY [redacted] | September 16 - October 15, 2017

Transactions

Transaction Date	Posting Date	Description	Reference Number	Account Number	Amount	Total
		Payments and Other Credits				
10/01	10/02	PAYMENT - THANK YOU				[redacted]
		TOTAL PAYMENTS AND OTHER CREDITS FOR THIS PERIOD				
		Purchases and Adjustments				
[redacted]						
10/09	10/11	NTS IT CARE INC 877-490-6709 CA	1381	[redacted]	169.99	[redacted]
		TOTAL PURCHASES AND ADJUSTMENTS FOR THIS PERIOD				
		Interest Charged				
[redacted]						

2017 Totals Year-to-Date	
Total fees charged in 2017	$0.00
Total interest charged in 2017	[redacted]

Interest Charge Calculation

Your **Annual Percentage Rate (APR)** is the annual interest rate on your account.

Type of Balance	Annual Percentage Rate	Promotional Transaction Type	Promotional Offer ID	Promotional Rate End Date	Balance Subject to Interest Rate	Interest Charges by Transaction Type
Purchases	13.99%V				$ [redacted]	
Balance Transfers	13.99%V				$ 0.00	$ 0.00
Direct Deposit and Check Cash Advances	20.24%V				$ 0.00	$ 0.00
Bank Cash Advances	25.24%V				$ 0.00	$ 0.00

APR Type Definitions Daily Interest Rate Type: V= Variable Rate (rate may vary)

Important Messages

$169.99 in dispute pending compliance with resolution procedure.

Your Reward Summary

[redacted] BASE EARNED THIS MONTH
[redacted] TOTAL AVAILABLE
VISIT BANKOFAMERICA.COM

Hickey Attachment B-2
FTC-TRO-0434

Hickey Attachment C

89239158 / Consumer Sentinel Network Complaint

Remove

Reference Number:	89239158	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	No
Comments:	My computer was seized remotely. A popup box appeared saying the computer operating system was in jeopardy. The company name and phone number were given. Info purported that it was authorized by Microsoft to do repair work remotely. The company rep. said he same thing. I could not back the computer out of the page which had appeared; I could not shut down the computer with key board command. Rep. told me he could "fix" the computer and protect it from virus/malware for a year for $169.99 which I finally authorized via credit card. Checking with Microsoft and others after dealing with these pirates, I found that that **NTS** is a company which specializes in scams. I have had a lock put on my bank and credit card accounts and have informed the bank that the $169.00 fee is fradulent.		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		**Load Date:**	10/10/2017 12:33:11 PM
Created By:	FTCCIS-FTCUSER	**Created Date:**	10/10/2017 12:33:12 PM
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Description:**	Tech Support Scams
Amount Requested:	$169.00	**Amount Paid:**	$169.00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	10/10/2017	**Transaction Date:**	10/09/2017
Initial Contact:	Internet Web Site	**Initial Response:**	Phone: 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	

Hickey Attachment D

Re: Welcome Nts IT Care

From: Pat [redacted]
To: support <support@ntsitcare.com>
Date: Mon, Oct 30, 2017 11:32 pm

Leave me along. I do not wish to do business with you thieves at all. You did NOT do work satisfactorily for me. You bastards at pirates and liars. NEVER contact me again by email or by phone.

—Original Message—
From: Nts IT Care <support@ntsitcare.com>
To: [redacted]
Sent: Mon, Oct 30, 2017 4:17 pm
Subject: Welcome Nts IT Care

NTS IT CARE

Dear Customer,
Greetings from NTS IT CARE
We would like to thank you for availing our services.
As per our records the required work on your PC/ Laptop was done as per your satisfaction.
As a standard procedure, we have attempted to call you to confirm the same, but unfortunately we reached your voicemail.
We would request you to kindly send us a confirmation email (by replying to this email).
However, if you are of the opinion that something more needs to be done which may further enhance your PC's performance then kindly feel free to call at the below mentioned numbers or reply to this email.
Thanks again for all your time and patience.

Best Regards
NTS IT Care Inc.
844 206 2608
Click here to leave mailing list

Hickey Attachment E

89976565 / Consumer Sentinel Network Complaint			
Reference Number:	89976565	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	No
Comments:	This is a follow up to a complaint I filed with FTC on 10/10/2017. It as about a ransomware scheme by **NTS** IT Care, Inc. in which **NTS** was able to seize control of my computer and refused to release it. A popup box on my computer screen directed me to call **NTS** which claimed to be "authorized" by Microsoft to do computer repairs. **NTS** refused to release control of the computer unless I paid **NTS** $169.99 to download their computer "security" software. After being coereced into agreeing to purchase **NTS** "services" using my Bank of America Visa card, I immediately notified Bank of America that I believed **NTS** was running a computer scam. Bank of America immediately put a hold on paying **NTS**. Over the next four days I received a seriies of emails and phone calls from **NTS** where **NTS** employees attempted to convince me to cancel the complaint to Bank of Amer. On advice from Bank of Amer. Visa I refused. On 10/12/2017, an **NTS** employee contacted my via phone. This guy, called "Michael", told me **NTS** would refund $100 to me if I would cancel the complaint to Bank of Am. and let the Visa charge go through. I refused. The next day there was another phone call from **NTS** employee "Michael" where he said that I could get the whole $169 refunded if I would only cancel the complaint to Bank of Amer. Visa and allow the charge to go through. Again, I refused. **NTS** also sent me an email with a copy of an email allegedly from me purporting that their services were satisfctory. That was a bogus. I never sent that to **NTS**. These people are liars and thieves. To stop the emails and phone calls, I contacted aol, which handles my email, and declared **NTS** contacts "spam." I have put a "stop" on my phone to prevent **NTS** operatives from calling my home.		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		**Load Date:**	11/05/2017 8:03:45 AM
Created By:	FTCCIS-FTCUSER	**Created Date:**	11/05/2017 8:03:45 AM
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Description:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	Internet
Complaint Date:	11/05/2017	**Transaction Date:**	

ALDEN F. ABBOTT
General Counsel

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SARAH SCHROEDER, Cal. Bar No. 221528
Federal Trade Commission
901 Market Street, Suite 570
San Francisco, CA 94103
rsolomon@ftc.gov, sschroeder@ftc.gov
Tel: (415) 848-5100; Fax: (415) 848-5184

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF WALTER KUEHN IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF WALTER KUEHN, III

1. My name is Walter Kuehn, III and I reside in Florida. I am retired and worked in the insurance and financial services industry. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. On November 20, 2017, I was completing some online banking and had just signed out of my account when a loud pop-up message appeared on my computer screen. As described in the attachments to this declaration, the pop-up said there was a problem with my computer, warned me not to shut off my computer, and instructed me call a phone number. The pop-up also implied that the message was associated with Microsoft. I could not access my files on my computer so I called the phone number.

3. The man who answered the phone said my firewall had been breached and my computer was infected. He accessed my computer remotely and spent approximately 45 minutes "cleaning up" my computer. He said he needed $249.99 to "fix" the breach and provide 2-years of network security for one computer. As it appeared from the pop-up that this was associated with Microsoft, I gave authorization to apply a charge in the amount of $249.99 to my credit card.

4. The more I thought about the exchange, the more I became suspicious of the pop-up and the man's representations as I had previously purchased computer security and firewall protection from Norton Antivirus ("Norton"). On November 26, 2017, I contacted Norton, and asked if my firewall had been breached. The agent at Norton said the firewall was intact and had not been breached. At that point, I realized NTS IT Care was a scam. I documented my experience and filed complaints with my credit card company and eventually the Federal Trade Commission ("FTC").

5. Attached to this declaration as **Kuehn Attachment A** are true and correct copies of complaints I filed with my credit card company regarding NTS IT Care. My complaints accurately depict my experience with NTS IT Care.

6. Attached to this declaration, as **Kuehn Attachment B** is a true and correct copy of my complaint to the FTC regarding NTS IT Care.

7. Attached to this declaration as **Kuehn Attachment C** are true and correct copies of correspondence with NTS IT Care, received by me directly or indirectly through my credit card company's investigation and subsequently forwarded to me. Kuehn Attachment C-5 contains my handwritten note explaining that at the time I sent NTS the email I did not realize I had been scammed.

8. Attached to this declaration as **Kuehn Attachment D** is a true and correct copy of a February 13, 2018 email from Norton Antivirus Support to me. The email states in part, "Mr. Kuehn was a victim of Unauthorized Support last November 20th of 2017 in where he was informed that his computer firewall was being breach but we have checked the computer and the computer was virus free."

9. On July 16, 2018, I received a phone call in which my caller ID showed a partial phone number for an incoming call (missing one digit). The caller spoke with an Indian dialect and based on how he worded his message it was apparent to me that he was associated with NTS IT Care. He wanted to offer me a refund due to a technical problem since I was within the two-year timeframe. He asked if I was near my computer and went on to say that he needed some code and numbers on it. I told him that I was not near my computer and asked if he could just send me a refund check. He said no and immediately hung up on me.

10. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 22, 2019, in Florida.

Walter Kuehn, III

Kuehn Attachment A

November 26, 2017

Bank of America : Fax # 1-888-672 6262

Re: Disputed Charge / Claim Number – [redacted] / Credit Card # Ending [redacted]

In follow-up to my phone conversation of 11/26/17 with one of your representatives, attached you will find documentation pertaining to a tech support related scam as my basis of disputing the charge dated 11/22/17 for NTS IT CARE INC (877) 490-6709 CA in the amount of $249.99.

On Monday 11/20/17, a voice / printed message popped-up on my computer screen that there was a problem with my computer, warned do not turn it off and call the number on the screen immediately to address the problem. It also gave the impression that Microsoft was aware of the issue as Microsoft name appeared on the screen as well.

I called the number (877) 855-3653 (1:59 pm), was told that my firewall was breached / infected and that they could remotely fix it and monitor – 1 year service plan – 149.99 / 2 year service plan – 249.99. It took about 45 minutes to "clean up". During the process, I received call backs from (424) 217-5156 (2:09 pm) and (2:42 pm). In addition, I recall seeing Norton's logo appear on the computer screen indicating whatever was being done was "safe" as far as Norton was concerned, which gave the appearance that this was legitimate.

While on the phone, they had me authorize the $249.99 charge to BOA which they e-mailed to confirm. During the process, BOA sent a message asking me to verify the pending charges for: Walmart, Winn-Dixie and NTS IT CARE INC., which I did.

Today, 11/26/17, I started having concerns about what happened, so I called Norton (855) 815 2726, explained what happened and was told that a tech support related scam occurred. As part of Norton's service the firewall is already protected (which I did not recall) and was not breached as NTS IT CARE implied.

Attached is a copy of an e-mail from Norton (their case ID # 33267451) and my responses to their four points:

- Yes, during the process the name Microsoft appeared on my computer screen which implied to me that Microsoft was aware of the problem and that NTS IT could resolve it. Also during the "clean up", I recall seeing that whatever was being done was Norton approved / safe.
- It was suggested that they would solve my firewall issue – over 1.3 million items scanned / 150 (?) items infected – now everything is "clean".
- Attached are copies of: e-mail from Norton/payment authorization form/e-mail from NTS IT
- Description name on credit card statement: NTS IT CARE INC (877) 490-6709 CA 249.99

I trust that the attached information provided is sufficient to reverse the NTS IT CARE INC (877) 490-6709 CA charge in the amount of $249.99. Thank you in advance for your assistance in this matter.

Sincerely,

Walter Kuehn, III

Kuehn Attachment B

92612050 / Consumer Sentinel Network Complaint

Remove

Reference Number:	92612050	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	No
Comments:	While on my computer, on 11/20/2017 a pop-up appeared on my screen indicating that there was a problem with my computer per Microsoft and to call the number on the screen and not to shut off my computer. It actually wasn't Microsoft, but it was **NTS IT CARE** Inc (who at the time I believed was acting as an agent for Microsoft - which turned out not to be the case. The person I talked to indicated that my firewall had been breached and that they could "fix it". I found out later through my virus protection provider (Norton) that this wasn't true, and that my computer had not been breached, and Norton conveyed that I had been victimiized by a tech support scam. They suggested that I contact my credit card company to see if they could recover the $249.99 charge (which I attempted too, but without success as of 2/8/18). I also did a search on-line and found examples of others who have experienced similar / and even worse problems. The $249.99 was a one-time charge to "fix" the breach and to provide a two years support with network security for 1 window computer. It was to be my responsibility to contact them once a month over the next two years so they could scan my computer. The more I thought about what had occurred, the more I wasn't comfortable about it. That's when I contacted Norton on 11/26/17 and also did a search on consumer complaints. Based on what happened to me and apparently others - this company appears to be in the business of scamming people - which in my mind is fraud! If there is any way you can be of assistance in recovering the $249.99 that was in my mind stolen from me, I would greatly appreciate it. You can reach me at the e-mail address or phone number I previously provided. UPDATE: 02/22/2018 Consumer calling in because he rcv'd a call from Unknown. They left him a message stating his Microsoft license had expired and needed to call back. Consumer didn't call back. CMartinez UPDATE 07/16/2018: Consumer is calling to report that he received a call from an individual stating to be from **NTS IT Care** offering a refund. Consumer did not comply . JLopez		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		**Load Date:**	02/09/2018 1:33:26 PM
Created By:	FTCCIS-FTCUSER	**Created Date:**	02/09/2018 1:33:26 PM
Updated By:	JLOPEZ	**Updated Date:**	07/16/2018 2:45:56 PM
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Description:**	Tech Support Scams
Amount Requested:	$250.00	**Amount Paid:**	$250.00
Payment Method:	Credit Card	**Agency Contact:**	Phone
Complaint Date:	07/16/2018	**Transaction Date:**	11/20/2017

Kuehn Attachment C

NTS IT CARE Inc. (1-844-208-2608)

1605 S Main St Ste 125 Milpitas CA 95035

ONE TIME PAYMENT AUTHORIZATION FORM

Personal Information

First Name Walter

Middle Name

Last Name Kuehn III

Contact Email [redacted]

Contact Phone Number [redacted]

Service Information

Please select the Service Plan 2 years support with network security for 1 window computer

Number of PCs/Laptops/Devices 1

Amount USD ($) 249.99

Antivirus na

Card Information

Last 4 digits of Card Number [redacted]

Last 4 of SSN [redacted]

Card Type visa

Please acknowledge and type your name here Walter Kuehn III

Declaration:-

By Signing this Form I Authorize and give **NTS IT Care Inc.** permission to debit my Credit / Debit Card for the amount indicated on or after the indicated date and also Understand that this is a One Time Charge. This Form is applicable for terms of services and payment as indicated in this Form along with the terms listed on the Website (www.ntsitcare.com).

Transaction Successful

Ref No :- 1801244850

Transaction Receipt	
Merchant:	**NTS IT Care Inc - (Milpitas, CA)**
Date/Time:	**11/20/2017 4:14:54 PM PST**
Transaction ID:	**3874930895**
Transaction Type:	**Card Settle**
Amount:	**249.99**
Credit Card Information	
CC Type:	Visa
CC Number:	**********[redacted]
Auth. Code:	03007C
Processor:	NTS IT Care - Nashville
Billing Information	**Shipping Information**
Walter Kuehn III [redacted]	,
Order Information	
Order ID:	9242
PO Number:	1166

This was amount charged.
[redacted]249.99

Signature Certificate

Document Reference: HL7I25I9PIKGUNLPK7NSAG

RightSignature
Easy Online Document Signing

Walter Kuehn III
Party ID: YMF7I2ISK4PVBB792IWCNI
IP Address: [redacted]

Walter Kuehn III

Multi-Factor
Digital Fingerprint Checksum [redacted]

Timestamp	Audit
2017-11-20 11:40:15 -0800	All parties have signed document. Signed copies sent to: NTS IT Care.
2017-11-20 11:40:14 -0800	Document signed by Walter Kuehn III (noemail@rightsignature.com) with drawn signature. - [redacted]
2017-11-20 11:40:13 -0800	Generated Document from Online Form AuthorizationForm_NTS_ITCARE_Onetime (AuthorizationForm-ffbbb2). - [redacted]
2017-11-20 11:36:26 -0800	Online Form viewed by Walter Kuehn III (noemail@rightsignature.com). - [redacted]

This signature page provides a record of the online activity executing this contract.

Subject: Notification Nts IT Care

From: support@ntsitcare.com
To: [redacted]
Date: Thursday, November 23, 2017 05:40:18 PM EST

NTS IT CARE

Dear Customer

Greetings from NTS IT CARE



It has recently come to our attention that some of our customers are receiving calls from imposters to be from NTS and/ or other companies requesting access to your computer by claiming that we are going out of business or promises of refunds or receiving notices from your computer(s)

We suggest you to disregard these phone calls and under no circumstance give them the remote access of your computer or pay any money for any reason.

We also would like to bring to your notice that as a Standard Operating Procedure, we (NTS) contact our customers only through emails, if in any case, you receive any phone call from anyone claiming to be NTS requesting access of your computer and later payment, kindly **Do Not** entertain such calls.

If you would like to verify the identity of anyone claiming to be NTS, please call us at the below mentioned numbers (24x7) for clarity.

We at NTS DO NOT ask for any extra amount from our customers until the service or subscription expires.

Again,

PLEASE DO NOT PAY MONEY BY ANY METHOD TO ANYONE WHO CLAIMS TO BE NTS.

Thanks & Regards,
NTS Support Team.
844-208-2608

You are receiving this email because you subscribed for newsletter
© Copyright, 2001-2014, Nts IT Care

Ref No :- 1801244850

NTS GLOBAL SERVICES

Support NTS It Care <support@ntsitcare.com>

Feedback for Dave
1 message

[redacted]

To: "support@ntsitcare.com" <support@ntsitcare.com>

Mon, Nov 20, 2017 at 1:01 PM

Thanks for your help. Hopefully this takes care of what was needed to be done.

At the time this occured, I did not realize that I had been scammed. They created the illusion of a problem, which in fact it turned out not to be. Had I realized it at the time, I certainly would not have closed out the on-line chat communication with the connect indicated above. All they essentially did was scam me and wait to charge me $249.99 in the process. That just isn't right!

Kuehn Attachment D

Subject: Norton Support - request for tech support scam information [ref:_00DA0Z067._5004A1ISEKH:ref]

From: nortonsupport2@symantec.com
To: [redacted]
Date: Sunday, November 26, 2017 08:01:11 AM EST

Norton

Case Id: [33267451]

Dear WalterKuehn III,

Thank you for reporting your encounter with a tech support related scam. We would appreciate if you could respond to this email with additional information to help us understand the details of your experience and improve our ability to protect Norton customers from this types of sophisticated social engineering threats.

- Did the scam involve use of Norton logos or any other company's trademarks?
- What problem did the tech support scammers suggest they could solve for you?
- Please provide any phone numbers or websites, emails or images you saved related to this scam.
- What was the description name on your credit card statement for the charge from the tech support scammer?

*You may simply take a picture of any documentation and attach it to a response email if that is easy for you. Please hide any personal or credit card information.

Resources to Report this issue to your Local Authority

- US Federal Trade Commission Complaint Assistant
- Canadian Anti-Fraud Centre
- UK – National Fraud and Cyber Crime Reporting Centre
- UK – Unsolicited calls Reporting

Thank you,

Norton Support

Thank you for choosing Norton

This message was sent in response to your recent Norton Support case. Your response will be included with your case records. Norton Support will reach out to you if previously scheduled, otherwise your response will be processed and no further action is required by you.

This email address is not monitored for new requests. If you require more help, please visit https://support.norton.com and contact us using the phone or chat option.

Powered by Symantec. ©1995-2017 Privacy Policy | Norton Support [ref:_00DA0Z67._5004A1ISEKH:ref]

Subject: **Norton Support**

From: nortonsupport2@symantec.com
To: [redacted]
Date: Tuesday, February 13, 2018 05:47:47 PM EST

Dear WalterKuehn III ,
Thank you for contacting Norton support!
Your case number is 34087723
Mr. Kuehn was a victim of Unauthorized Support last November 20th of 2017 in where he was informed that his computer firewall was being breach but we have checked the computer and the computer was virus free.
If you have any further queries in the meantime, please do not hesitate to contact us again quoting your case number.
Support can also at all times be accessed by clicking the Support link in your Norton product.
Free chat support: www.norton.com/chat
Support Portal website: At http://www.norton.com/support/ you can also browse for a solution to your questions through our self help documentation.
Kind regards,
Norton Support
Thank you for choosing Norton
This message was sent in response to your recent Norton Support case. Your response will be included with your case records. Norton Support will reach out to you if previously scheduled, otherwise your response will be processed and no further action is required by you.
This email address is not monitored for new requests. If you require more help, please visit https://support.norton.com and contact us using the phone or chat option.
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF FRAN MIGLIACCIO IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF FRAN MIGLIACCIO

1. My name is Fran Migliaccio and I reside in Rhode Island. I am a poet, journalist, and author of two books – Ghosts of Block Island and More Ghosts of Block Island. The following statements are within my personal knowledge.

2. In November 2017, I was reviewing my bank account online when a banner appeared at the top of my computer screen. The banner stated that my computer would shut down due to a security breach if I did not immediately call the phone number on the banner. I was very alarmed because the alert appeared to be associated with my bank.

3. I called the phone number listed on the banner and spoke with a man who had an Indian accent. He promised to fix my computer if I allowed him remote access to my machine. I gave him access to my computer and he was very invasive, searching many folders and files. He said he could install a product called AdBlock on my computer to fix the virus at a cost of $200. I asked him to leave my computer and he became angry. We had an argument and I asked to speak to his supervisor. He tranfered me to another man, who was also very abrasive and threatening. He said he would not relinquish control of my computer unless I purchased a 2-year technical support contract from his company, and gave him a statement of customer satisfaction. He said no money would leave my account until I supplied the statement of customer satisfaction. I told him it felt like an extortion scam.

4. I had no choice and felt as though I had to pay the man to regain control of my computer. After I gave the man my debit card information, he finally cancelled the remote connection to my computer. He asked again for a statement of customer satisfaction, and I refused.

5. The following month, in December 2017, a company called NTS IT Care withdrew $199.99 from my bank account. NTS also emailed me a receipt and other documents, but I have since deleted the emails.

6. I was disturbed by NTS's action and filed a complaint against the company with the Better Business Bureau ("BBB"). On January 29, 2018, I made the following statement to the BBB about NTS:

"NATURE OF DISPUTE: NTS IT Care solicited unneeded services.They tried to get a statement of customer satisfaction. I refused. They took $199.99 from my bank account. NTS solicited business with a banner ad saying they would shut down my computer due to a security breach if I did not call them immediately. This is a scare tactic. They insisted on installing an AdBlock that I did not need, to prevent further banners of that sort. I allowed them to do so, as they had frightened me with their demand that I call them. The process was intrusive and time-wasting, involving their access to my computer. After the installation, they tried to extract a statement of customer satisfaction from me, assuring me that NO money would leave my bank account until they had that statement from me. I refused, I was very angry that point, and I hung up on them. This was in November 2017. The following month, on December 11, 2017, they removed $199.99 from my account. I had given them my debit card number and agreed to a 2-year contract because they frightened me into it by taking control of my computer.

DESIRED RESOLUTION: I went to the NTS IT Care website today, and discovered that the company will give a refund if customer satisfaction is lacking. I hereby demand a refund from this company. As far as I am concerned, they are scam artists who use deception and intimidation to extract money from the unwary."

7. After I filed the BBB complaint, NTS refunded me $199.99. As I said in my BBB complaint, the people who run NTS are fraudulent, using deception and intimidation to extract money from the unwary.

8. I declare under penalty of perjury that the foregoing is true and correct. Executed on October 7, 2019, in Rhode Island.

Frances Migliaccio

Frances Migliaccio

ALDEN F. ABBOTT
General Counsel

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Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF RICHELLE MUHLITNER IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF RICHELLE MUHLITNER

1. My name is Richelle Muhlitner and I reside in Pleasanton, California. The following statements are within my personal knowledge.

2. In early April 2017, my mother told me a loud pop-up appeared on her computer stating the machine had a virus. She was worried her computer was infected so she called the phone number listed on the pop-up. The people she spoke with demanded payment to "fix" her computer. My mother told me they were very forceful and would not take no for an answer. My mother gave them her payment information and NTS IT Care charged her $235.99. My mother was living in San Francisco at the time all of this activity occurred.

3. On April 13, 2017, I filed the following complaint on my mother's behalf with the Better Business Bureau:

"Company Name: NTS IT Care, Inc.

My elderly mother received a pop up notice on her computer regarding a virus. She was charged $235.99 for them to 'fix' her computer. My elderly mother received a notice 'voice' on her computer telling her she needed fix April 5, 2017. When I asked about it she told me they were very forceful and would not take no for an answer. She has memory problems and ended up paying $235.99 to NTS Software for them to fix her computer.

When I called them to ask how they can get into her computer like that, they blew me off by saying her computer needed fixing and she signed off on waivers and agreements. Also that the company has a great rating with the BBB. I really don't know what happened because she really doesn't remember enough to walk me through it, but looking at the BBB website it sounds like the same issues have happened to others. They claim they have fixed her issues for two more years. I am concerned that this company just goes into peoples private computers and gets peoples money. --- Additional Comments: Want others to be aware of this practice and have them not allowed to use this practice."

4. I declare under penalty of perjury that the foregoing is true and correct. Executed on 11-18-19, 2019, in California.

Richelle Muhlitner

Richelle Muhlitner

ALDEN F. ABBOTT
General Counsel

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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF PETER PERRETEN IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF PETER PERRETEN

1. My name is Peter Perreten and I reside in Pennsylvania. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. In early 2019, I was interrupted while working on my desktop computer by a loud beeping pop-up message telling me to call a phone number or else my computer would crash in a few minutes. I could not figure out how to close the pop-up and was in a hurry to get something on my computer. I needed help so I called the phone number on the pop-up. I wasn't sure who I was calling. The caller ID feature on my cell phone identified the number I called as being from California.

3. The man I spoke with said several viruses were infecting my computer and that his company, NTS It Care ("NTS"), would fix the problem if I paid him $299. I'm 75 years old and not very literate with computers. My computer was not working so I gave the man my credit card number and the last four digits of my social security number. The man, who had what seemed like an Indian accent, took control of my computer remotely and said he fixed the problem. After he alledgely removed the virus, my computer seemed to work ok.

4. After I spoke with NTS, I received approximately a dozen calls from non-English speakers claiming to work with NTS.

5. In March 2019, I watched an NBC news story about tech support scam and because suspicious of NTS. I researched NTS on the internet and discovered several web sites warning that NTS is a scam. I also took my computer to Best Buy where the Geek Squad Service checked it out and said it did not have a virus.

6. On March 8, 2019, I filed a complaint against NTS with the Federal Trade Commission. A true and correct copy of my March 8, 2019 complaint to the FTC, with my personal information redacted, is attached as **Perreten Attachment A**.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on 24 August, 2019, in Pennsylvania.

Peter Perreten

Peter Perreten

Perreten Attachment A

CONSUMER SENTINEL NETWORK PRINT

Record # 1 / 104787098 / Consumer Sentinel Network Complaint			
Reference Number:	104787098	Originator Reference Number:	
Language:	English	Contact Type:	Complaint
Source:	Consumer	DNC?:	No
Comments:	I was interrupted while working on my desktop computer by a message telling me to call a phone number or else my computer would crash in a few minutes. I couldn't figure out how to stop the message, so I called the number and was told that several viruses were infecting my computer, and that NTS IT CARE would fix the problem if I paid them $299. I gave them my Citi Card number and the last four digits of my SS NTS IT CARE took control of my computer and said that they fixed the problems The computer seems to be working ok Last night on NBC news I heard that a scam was going around I became suspicious So I did some research on the internet and discovered that some web sites warned that NTS IT CARE is a scam outfit Can you tell me if this is true If NTS IT CARE is not a legitimate company, can I get my money back? Thanks for your help		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		Load Date:	03/08/2019 8:26:44 AM
Created By:	FTCCIS FTCUSER	Created Date:	03/08/2019 8:26:44 AM
Updated By:		Updated Date:	
Complaint Source:	FTC Online Complaint Assistant (CIS)	Product Service Description:	Tech Support Scams
Amount Requested:	$299.00	Amount Paid:	$299.00
Payment Method:	Credit Card	Agency Contact:	Internet
Complaint Date:	03/08/2019	Transaction Date:	02/27/2019
Initial Contact:	Internet Web Site	Initial Response:	Phone: 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP)	Law Violation:	Deception/Misrepresentation
Topic:		Dispute with Credit	

Consumer Information			
Consumer Small Business or Organization:			
First Name:	Peter	Last Name:	Perreten
Address 1:	[redacted]	Address 2:	
City:	[redacted]	State:	Pennsylvania
Zip:	[redacted]	Country:	UNITED STATES
Home Number:	[redacted]	Cell Number:	
Work Number:		Ext:	
Fax Number:		Email:	[redacted]
Age Range:	70 - 79	Military Service Branch:	
Soldier Status:		Soldier Station:	

Subject			
Subject:	Nts It Care	Normalized Name:	Nts It Care
Address 1:	1605 S Main St	Address 2:	Ste 125
City:	Milpitas	State/Prov:	California
ZIP:	95035	Country:	UNITED STATES
Email:		URL:	
Phone Number:	849 6599899	Ext:	
Subject ID Type:		Subject ID Issuer State:	
Subject ID Issuer Country:			
Representative Name:	Patrick	Title:	NTS IT CARE

Perreten Attachment A

ALDEN F. ABBOTT
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FEDERAL TRADE COMMISSION

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JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF DONALD PHILLIPS IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF DONALD PHILLIPS

1. My name is Donald Phillips and I reside in Pennsylvania. I work at a medical center and am preparing for retirement. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. In July 2019, I was searching for social security information on the Internet. I visited what appeared to be an official Social Security Administration ("SSA") website and viewed information about planning for retirement.

3. ~~Soon~~ Immediately after I visited the SSA website, a pop-up appeared on my computer screen stating that Microsoft Windows had detected a virus on my computer. The pop-up made a loud beeping sound and said I would lose all my data if I turned off my computer. I could not close the pop-up or access material on my computer. The pop-up instructed me to call a toll free phone number to solve the problem.

4. I called the phone number listed on the pop-up and hoped that Microsoft could remove the virus from my computer. The man who answered my call sounded like he spoke an Indian dialect. I asked him several times during the call whether he was sure he worked with Microsoft, and each time he said yes. He said his company handled things like this for Microsoft.

5. The man said he could remove the virus and give me a 2-year virus protection service for $299.99. My computer was frozen and I had no choice but to pay him – he had me in a corner. Because I thought he was affiliated with Microsoft, I allowed the man to access my computer. He sent me an email with a link and I gave him permission to remote into my computer. He appeared to install a folder on my computer and said he removed the virus. My computer began working again.

6. On July 9, 2019, I received an email from NTS IT Care ("NTS") stating that I had purchased the following service from NTS: "One Time Fix with 1 year extended software support warranty on 1 computer with peripheral devices." I also received a payment authorization and signature certificate. True and correct copies of the documentes I received

from NTS, containing my handwritten notes and with my personal information redacted, are attached as **Phillips Attachment A**.

7. After I received the email from NTS, I decided to research the company and found online complaints about NTS's fake pop-ups. I immediately filed a complaint with the Better Business Bureau ("BBB"). On July 10, 2019, I made the following statement to the BBB about NTS:

> "They put a pop up on my computer claiming I had a virus that would expose all my information. I had to call them to get the issue fixed. They put a pop up on my computer claiming I had a virus that would expose all my information and that they were associated with Windows. I could not do anything with my computer. It was frozen until I called them. Then they told me my internal security had expired and they could fix the problem. In order to get my computer back I had to order their services."

8. After I filed the BBB complaint, a man from NTS called me and said he needed to remove everything NTS had installed on my computer, including antivirus software. I did not grant him remote access to my computer so he tried to walk me through the uninstallation process. However, we could not find the NTS folder and it appears NTS did not download anything onto my computer.

9. After I realized NTS was a scam, I looked though paperwork the company gave me. I then noticed for the first time that the NTS's "Payment Confirmation Authorization" said in small print that NTS was not affilated with companies like Microsoft. This statement directly contradicted what the NTS agent told me numerous times on the phone. He lied to me and said he worked with Microsoft.

10. Because I immediately filed a complaint with the BBB, NTS does not appear to have charged my credit card $299.99.

11. I declare under penalty of perjury that the foregoing is true and correct. Executed on 10 October, 2019, in Pennsylvania.

Donald Phillips

Donald Phillips

Phillips Attachment A

You're done signing! Payment Confirmation Authorization - donald phillips

Document ID: fe4f67fa6d1748a8295ed3ec76ff3ce88c87b7a5 **July 9, 2019**
Signed On : https://securepay.ntsitcare.com/wp

Payment Confirmation Authorization - donald phillips

NTS IT CARE

NTS IT CARE Inc. (1-844-659-9899)

1605 S Main St Ste 125 Milpitas CA 95035

NTS IT Care Inc. is an Independent Service Provider and is NOT associated or affiliated with any other brand like Microsoft/Windows/Apple or any Internet Service Provider.

We at NTS IT CARE INC. DO NOT call our customer for payments during or after the service contract is over. We only accept payments through Debit. Credit or E-Checks. PLEASE DO NOT PAY MONEY BY ANY METHOD Ex: Gift Cards, I-Tunes cards, Google Play Cards etc. TO ANYONE WHO CLAIMS TO BE NTS IT CARE INC.

Personal Information

First Name	donald
Middle Name	
Last Name	phillips
Contact Email	[redacted]
Contact Phone Number	[redacted]

Service Information

Please select Service Plan	One Time Fix with 2 years extended software support warranty on one computer with peripheral devices
Number of PCs/Laptops/Devices	1
Amount USD ($)	$299.99
Antivirus	na

Card Information

Last 4 digits of Card Number	[redacted]

Phillips Attachment A-1

Signature Certificate

Document name: Payment Confirmation Authorization - donal...

Unique Document ID: FE4F67FA6D1748A8295ED3EC76FF3CE88C87B7A5

LEGALLY SIGNED USING WPesignature
Build. Track. Sign Contracts.



donald phillips
Party ID: c4f9f643-d019-4ed4-b487-3012bcdd09bb
IP Address: 207.44.35.97

Digital Signature:

donald phillips
not my signature

Multi-Factor Digital Fingerprint Checksum c992768bfab2396cf3c5f66e1fdb6271

Timestamp	Audit
July 9, 2019 7:22 pm EDT	Payment Confirmation Authorization - donald phillips Uploaded by NTS IT CARE - support@ntsitcare.com IP [redacted]
July 9, 2019 7:22 pm EDT	Document signed by donald phillips - [redacted]
July 9, 2019 7:22 pm EDT	NTS IT CARE - support@ntsitcare.com added by NTS IT CARE - support@ntsitcare.com as a CC'd Recipient Ip: [redacted]
July 9, 2019 7:22 pm EDT	The document has been signed by all parties and is now closed.

This audit trail report provides a detailed record of the online activity and events recorded for this document.

https://securepay.ntsitcare.com/wp/

Audit Trail Serial# 3b9fdb63c9cb462ec5df679436e8504a

Phillips Attachment A-2

Card Type	visa card
Payment Method	credit card

Please acknowledge and type your name here donald phillips

Declaration:-

By Signing this Form I Authorize and give **NTS IT Care Inc.** permission to debit my Credit / Debit Card for the amount indicated on or after the indicated date and also Understand that this is a One Time Charge. This Form is applicable for terms of services and payment as indicated in this Form along with the terms listed on the Website www.ntsitcare.com.

donald phillips – not my signature

Signed by donald phillips
Signed on:July 9, 2019

ALDEN F. ABBOTT
General Counsel

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Plaintiff,

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JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF CAROLYN STANDLEY IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF CAROLYN STANDLEY

1. My name is Carolyn Standley, and I reside in Corrigan, Texas. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. On May 13, 2019, I logged onto the computer that I use for my business managing a tax preparation service. I am the only person who uses and has access to this computer. When I logged onto my computer, a pop-up window appeared on my screen. The pop-up window appeared to be from Microsoft, and it had a telephone number to call for technical support. The pop-up window froze my computer, and I could not access any information or files on my computer. Before I got this pop-up, I had not had any problems with my computer, and it had been working well.

3. I called the telephone number listed on the pop-up window, and I reached a company called NTS IT Care ("NTS"). The NTS phone representative spoke with a foreign or Indian accent. He told me that NTS was a Microsoft certified agent or contractor, and led me to believe that I was speaking with a bona fide Microsoft agent or representative. I would not have continued speaking with the NTS representative if I had known he was not a Microsoft agent.

4. The NTS phone representative told me that my computer was infected with a virus. He told me that the virus was called a Trojan or DNS changer virus. He offered to fix my computer and remove the virus for a fee, and offered multi-year service contract options that I could purchase.

5. Since I believed NTS to be affiliated with Microsoft, I felt like I had no other choice but to pay NTS to remove the virus. I gave the NTS representative my credit card information, and purchased what I was told was a 3-year service plan that cost $500. **Standley**

Attachment A is a true and correct copy of a statement from my credit card company showing a charge from NTS on May 13, 2019, along with some of my handwritten notes. My personal information has been redacted from all attachments to my declaration.

6. The NTS representative gained remote access to my computer, took control of my computer, appeared to delete some files, and told me he had fixed my computer and had removed the virus from it. A few minutes after I gave the NTS representative my credit card information for the $500 charge, I received a text message alert from my credit card's fraud department that an additional charge for $1,800 had been charged to my credit card. The credit card company flagged this charge as fraudulent or suspicious. Since I never approved a charge for $1,800, the credit card company agreed to remove it. I eventually had to close that credit card account and open a new one because of this fraudulent activity. I believe that this unauthorized charge came from NTS, since it happened moments after I gave the NTS representative my credit card information over the phone. I believe that NTS was trying to authorize an additional charge of $1,800, on top of the $500 I paid them.

7. After my call with NTS ended, I decided to research NTS and looked up information about it on the Internet. I quickly discovered that there were many complaints about NTS being a scam and not legitimate, and that NTS was not affiliated with Microsoft. I felt like I had also been scammed out of money by NTS. I disputed the $500 charge from NTS with my credit card company. I also called NTS to tell them I would not be paying the $500 charge. **Standley Attachment B** is a true and correct copy of a letter I received concerning the disputed charge from my credit card company.

8. I also filed a complaint about NTS with the Better Business Bureau on or about July 29, 2019. **Standley Attachment C** is a true and correct copy of the complaint I provided to

the Better Business Bureau, with my personal information redacted. After filing a complaint with the Better Business Bureau, the $500 charge from NTS was credited back to me.

9. On July 30, 2019, I received a telephone call from someone who told me they were with NTS. The NTS representative told me that NTS was shutting down its business, and that they would refund me the money I had paid them. They asked to access my computer, so that they could "look at something." I immediately told the NTS representative "no" and hung up the phone. By this point, I believed NTS was a scam, and I did not want to give them any further access to my computer.

10. I believe that NTS caused the pop-up to appear on my computer in May 2019 so that they could scam unsuspecting people like me into agreeing to charges.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 10-22, 2019 in Texas.

Carolyn Standley

Standley Attachment A

Citi(R) Cards
P.O. Box 6063
Sioux Falls, SD 57117-6063

August 05, 2019

00000049 BB CCC 218 BDPASSNN AM1

CAROLYN A STANDLEY
[redacted]

318
DC08

ACCOUNT NUMBER
[redacted]

Dear CAROLYN A STANDLEY:

This letter concerns the transaction described below made with card number [redacted]

Date	Amount	Description		
05/13/2019	$500.00	NTS IT CARE INC	877-490-6709	CA

You were previously rebilled for this charge. We have re-credited your account. This adjustment will appear within one to two billing cycles.

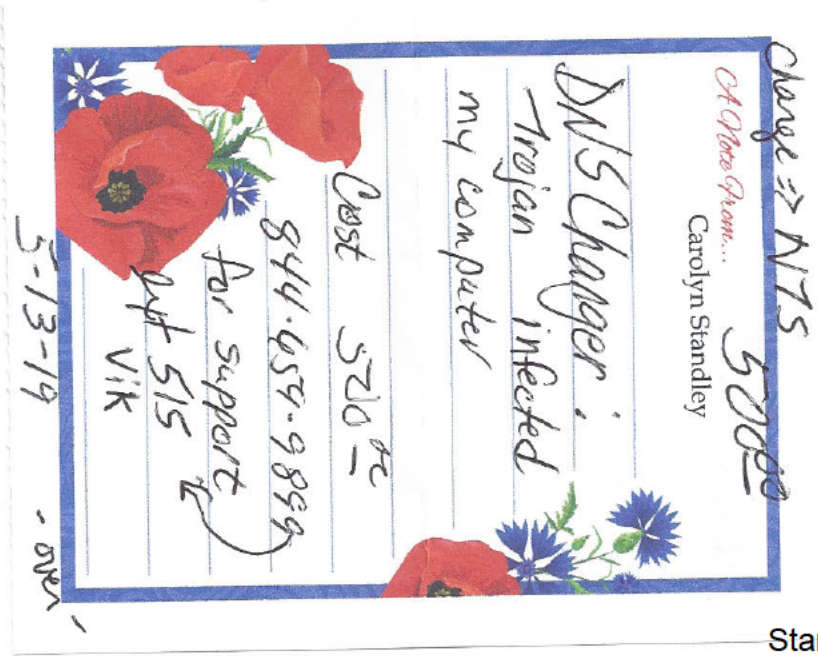
We apologize for any inconvenience this may have caused.

Sincerely,

Your Customer Service Team

FEDERAL REGULATIONS REQUIRE THE STATEMENT PRINTED ON THE REVERSE SIDE.

/RPRLTR/L9/SD/RR/6012/DM86422/D-924630080619//00048



Standley Attachment A

Standley Attachment B

Called 7-9-19 10:30am Citi - they are to investigate further -

citi

PO Box 6013
Sioux Falls, SD 57117-6013

Return Service Requested

June 25, 2019

ACTION REQUIRED

00000121 1 15801636 DTF 00000121

01025779
F106

CAROLYN A STANDLEY
[redacted]

Carolyn A Standley
Cardmember since [redacted]
Account ending in [redacted]



We heard back from the merchant

Please provide the information requested below.

Hi, Carolyn.

We wanted to provide a quick update for the $500.00 dispute with NTS IT CARE INC 877-490-6709 CA on account ending in [redacted]. We heard back from the merchant and need you to confirm whether or not this transaction was authorized.

Enclosed is a copy of the documentation we received from the merchant, which includes the item(s) this charge is for, and signatures for your review.

After you review this information, please check the appropriate statement below, then sign and date, scan, and email it back to us at billingdisputes@citi.com. Be sure to include this ID in the subject line of your email: D-924630080619. If you send us this information by email, please don't attach zip files - they're not compatible with our system.

_____Neither I, nor anyone authorized by me, made this transaction or received any benefit. The signature(s) provided are not mine.

0.LZ970026001.I2019062570435516.299.I.SD.SC.2622.NA96507.EP.D-924630080619-TENDAYSIGN

Standley Attachment C

110554875 / Consumer Sentinel Network Complaint

Reference Number:	110554875	**Originator Reference Number:**	12160000715530
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	No
Comments:	I feel that NTS IT CARE conned me into giving my credit card information to them. I think they breached my computer, then offered to fix it.On May 13, 2019 my computer that I use for business froze. I could not access any information. A phone number for technical support popped up on my screen. It appeared to be from Microsoft. I called the phone number and a technician from NTS said they could fix the problem for a fee. Not really having a choice, I agreed and gave them my credit card information. The technician gained remote access to my computer and fixed the problem. Immediately I got an alert from my credit card company that there was unauthorized charges to my card. My credit card company seemed to think that the NTS company scammed me. I had to close that credit card account and open another one due to this. I think NTS plants the viruses or ramsomeware or whatever and scams unsuspecting people like me into agreeing to charges. Then they also try to make unauthorized charges to the credit card. I do no think I should reward their unethical behavior by having to pay this charge of $500.00. --- Additional Comments: NTS should refund the $500.00 charged to my CitiBusiness credit card.		
Complaint disposition provided?:	Yes		
Complaint Disposition:	RESOLVED. The complainant verified the issue was resolved to his/her satisfaction.		
Data Reference:		**Load Date:**	08/18/2019 10:19:12 PM
Created By:	BBBSANCA-USER	**Created Date:**	07/31/2019 12:00:00 AM
Updated By:		**Updated Date:**	
Complaint Source:	BBB CA San Jose	**Product Service Description:**	Computers: Equipment\Software
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	07/31/2019	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:		**Law Violation:**	
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:		**Cross Border Complaint?:**	No

Consumer Information

Consumer Small Business or Organization:			
First Name:	CAROLYN A	**Last Name:**	STANDLEY
Address 1:	[redacted]	**Address 2:**	
City:		**State:**	Texas
Zip:		**Country:**	UNITED STATES
Home Number:		**Cell Number:**	
Work Number:		**Ext:**	
Fax Number:			
Email:		**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	Nts It Care Inc	**Normalized Name:**	Nts It Care Inc
Address:	1605 S Main St #125		
City:	Milpitas	**State/Prov:**	California
ZIP:	*(Cleansed: 95035)*	**Country:**	UNITED STATES
Email:		**URL:**	www.ntsitcare.com
Phone Number:	866-7631760	**Ext:**	
Subject ID Type:			
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

ALDEN F. ABBOTT
General Counsel

RONNIE SOLOMON, Cal. Bar No. 284923
SARAH SCHROEDER, Cal. Bar No. 221528
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Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF THOMAS SCHMIDT IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF THOMAS SCHMIDT

1. My name is Thomas Schmidt and I reside in Ohio. I am in my 70's and have owned and operated a family business for over 30 years. The following statements are within my personal knowledge and if called as a witness I would competently testify thereto.

2. On November 30, 2018, I came home and found my wife (Jeanne Schmidt), an 81-year old former Catholic nun, crying because our computer was not working. She explained to me that she was reading her friends' posts on Facebook when she saw a news article about actor Hugh Jackman. She clicked on the article and a loud pop-up message suddenly appeared on the computer screen. She said the pop-up blared loudly, flashed, and looked official. She told me she could not close the pop-up or access files on our computer. I keep my business records on that computer and she was worried they would be deleted by a computer virus.

3. My wife told me she called the phone number on the pop-up and spoke with a man who said he detected a virus on the computer. He said he could remove the pop-up if she purchased computer support services from his company, NTS IT Care ("NTS"). She gave the man our credit card number and agreed to purchase 2-years of computer support services.

4. When I arrived home, my wife was still talking to the man about our computer. She was scared and upset, and told me he was fixing our computer. I had to learn computer software for my business and am more computer savvy than most people my age. I watched what the man was doing on the computer and he was just snooping around, opening and closing folders. I realized what was happening, so I took over the call and got upset with the guy. I told him he had scammed an 81-year old lady. He said he had installed MacAfee antivirus software on the computer, but I checked the computer applications and he had not downloaded MacAfee. He did download a pdf onto the computer that described NTS's computer services. The man had an Indian accent. He was a smooth talker and had the pitch down beautifully – I could see him scamming lots of people. I argued with the man for a while and he talked in circles. I finally hung up.

5. I immediately called my credit card company, Chase, to report a possible fraudulent charge from NTS. The Chase representative said she could not do anything because

no charge from NTS had posted to my account. She told me to call NTS and ask for a refund or try to work out a deal. I called NTS and spoke with another man who also talked in circles. Ultimately, NTS said it would not charge me and I felt more relaxed.

6. Approximately three weeks later, I noticed a $249.99 charge on my credit card from NTS. I called Chase again to dispute the charge. Chase temporarily suspended the charge and required lots of documentation about the transaction. I sent Chase documents detailing NTS's lies on three occasions, but Chase did not reverse the charge. I ended up cancelling all my credit cards with Chase. I believe NTS intentionally waited several weeks to charge my credit card because it did not want me to get a chargeback from Chase.

7. For about a month after this incident, my wife received phone calls from people claiming to be from NTS. All the callers had Indian accents and mispronounced her name. The caller ID on her phone identified the calls as coming from "NTS," phone numbers with a California area code, and even our own phone number. The calls were very annoying and she hung up right away.

8. I did not want other people to be scammed by NTS so I filed a complaint on my wife's behalf with the Federal Trade Commission. A true and correct copy of my December 2, 2018 complaint to the FTC about NTS, with my personal information redacted, is attached as **Thomas Schmidt Attachment A**. I am concerned that NTS is targeting older adults. In my experience, younger people do not use Facebook as much as older adults. By placing deceptive pop-up ads on Facebook, NTS is targeting people who did not grow up with computers. I have never filed a complaint with the FTC before, but I was frustrated by NTS's lies.

9. I declare under penalty of perjury that the foregoing is true and correct. Executed on Sept 9, 2019, 2019, in Ohio.

Thomas Schmidt

T. Schmidt Attachment A

102400416 / Consumer Sentinel Network Complaint

Reference Number:	102400416	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	No
Comments:	I am 81 years old and try to stay in contact with family on facebbook I made the mistake of clicking on a news article and instead was a pop-up saying mycomputer had a virus and to call their number at NTS IT Care inc I was afraid and was told that I needed antivirus for 249 00 I used a Visa and was told they would fix the problem. I later found out that this was part of a freudulent scam that was actually listed many times on Google. I have applied for a new Visa card I actually have avg antivirus so I know the pop-up could have been deleted if I knew how and I should not have called the number I also gave them permission to control my computer from wherever they were working. Other-Other Update		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		**Load Date:**	12/02/2018 9 33 56 AM
Created By:	FTCCIS-FTCUSER	**Created Date:**	12/02/2018 9 33 56 AM
Updated By:	CRSS\slyons1	**Updated Date:**	12/12/2018 12 43 05 PM
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Description:**	Tech Support Scams
Amount Requested:	$249 00	**Amount Paid:**	$249 00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	12/02/2018	**Transaction Date:**	11/30/2018
Initial Contact:	I Initiated Contact	**Initial Response:**	Phone: 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP) Rule\Other	**Law Violation:**	Deception/Misrepresentation Other (Note the Violation in the Comment Field)
Topic:		**Dispute with Credit Bureau?:**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No	**Cross Border Complaint?:**	No

Consumer Information

Consumer Small Business or Organization:			
First Name:	Jeanne	**Last Name:**	Schmidt
Address 1:	[redacted]	**Address 2:**	
City:		**State:**	Ohio
Zip:		**Country:**	UNITED STATES
Home Number:		**Cell Number:**	
Work Number:		**Ext:**	
Fax Number:			
Email:		**Age Range:**	60 and Over
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

View Similar Subjects — Add Alert for this Subject

Subject:	NTS IT CARE	**Normalized Name:**	Nts It Care
Address:	1605 S Main St Ste		
City:	Milpitas	**State/Prov:**	California
ZIP:	95035	**Country:**	UNITED STATES

Thomas Schmidt Attachment A-1

Email:		URL:	ntsitcare.com
Phone Number:	844-2082608	Ext:	
Subject ID Type:			
Subject ID Issuer State:		Subject ID Issuer Country:	
Representative Name:	Darius Reeves	Title:	assistant

ALDEN F. ABBOTT
General Counsel

RONNIE SOLOMON, Cal. Bar No. 284923
SARAH SCHROEDER, Cal. Bar No. 221528
Federal Trade Commission
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rsolomon@ftc.gov, sschroeder@ftc.gov
Tel: (415) 848-5100; Fax: (415) 848-5184

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. _____

FILED UNDER SEAL

DECLARATION OF JEANNE SCHMIDT IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF JEANNE SCHMIDT

1. My name is Jeanne Schmidt and I reside in Ohio. I am an 81-year old former Catholic nun who remains active in my community, including playing piano for choral groups that visit nursing homes. The following statements are within my personal knowledge.

2. On November 30, 2018, I was reading my friends' posts on Facebook when I saw a news article about Hugh Jackman. I clicked on the article and a loud pop-up message suddenly appeared on my computer screen. The pop-up blared loudly, flashed, and looked official. I could not close the pop-up or access files on the computer. My husband keeps his business records on that computer and I was worried they would be deleted by a computer virus.

3. I called the phone number on the pop-up and spoke with a man who said he detected a virus on the computer. He said he would remove the pop-up if I purchased computer services from his company, NTS IT Care ("NTS"). He would not fix the computer until I agreed to purchase his computer services. I needed help so I gave the man my credit card number and agreed to purchase 2-years of computer support services. The man instructed me to electronically sign a payment authorization. True and correct copies of the payment authorization and Signature Certificate that I received from NTS are attached as **Jeanne Schmidt Attachment A**.

4. I was still talking to the man about the computer when my husband came home. I was scared and upset, and told him that someone was fixing our computer. My husband is more computer savvy than most people our age. He challenged the man and told him he was trying to scam us. Even though my husband told the man not to charge us, NTS charged our credit card $249.99.

5. For about a month after this incident, I received phone calls from people claiming to be from NTS. All the callers had Indian accents. The caller ID on my phone identified the calls as coming from "NTS," phone numbers with a California area code, and even our own phone number. The calls were very annoying.

6. My husband did not want other people to be scammed by NTS so he filed a complaint on my behalf with the Federal Trade Commission. His complaint accurately reflects

my experience with NTS. A true and correct copy of his complaint to the FTC about NTS, with our personal information redacted, is attached as **Jeanne Schmidt Attachment B**.

7. I declare under penalty of perjury that the foregoing is true and correct. Executed on September 9, 2019, in Ohio.

Jeanne Schmidt

Jeanne Schmidt

J. Schmidt Attachment A

Please acknowledge and type your name here Jeanne Schmidt

Declaration:-

By Signing this Form I Authorize and give **NTS IT Care Inc.** permission to debit my Credit / Debit Card for the amount indicated on or after the indicated date and also Understand that this is a One Time Charge. This Form is applicable for terms of services and payment as indicated in this Form along with the terms listed on the Website www.ntsitcare.com.

Jeanne Schmidt

Signed by Jeanne Schmidt
Signed on:November 30, 2018

Signature Certificate

Document name: Payment Confirmation Authorization - Jeann...

Unique Document ID: C7BFDA61C401ABC3560ADF028FC56788010DDBDF

LEGALLY SIGNED USING WPesignature
Build. Track. Sign Contracts.



Jeanne Schmidt
Party ID: 5ae16de0-0aa0-455c-a5c5-e0f03d257533
IP Address: 74.215.94.173

Digital Signature:
Jeanne Schmidt

Multi-Factor Digital Fingerprint Checksum 6187105a84e66f7a9ee7e7dd8721186f

Timestamp	Audit
November 30, 2018 10:49 am EST	Payment Confirmation Authorization - Jeanne Schmidt Uploaded by NTS IT CARE - support@ntsitcare.com IP 172.17.210.66
November 30, 2018 10:49 am EST	Document signed by Jeanne Schmidt - [redacted] IP [redacted]
November 30, 2018 10:49 am EST	NTS IT CARE - support@ntsitcare.com added by NTS IT CARE - support@ntsitcare.com as a CC'd Recipient ip: 172.17.210.66
November 30, 2018 10:49 am EST	The document has been signed by all parties and is now closed.

This audit trail report provides a detailed record of the online activity and events recorded for this document.

https://securepay.ntsitcare.com/wp/

Audit Trail Serial# 0cb6b5a3abe90c7142ece387b04e9304

Jeanne Schmidt Attachment A-2

J. Schmidt Attachment B

102400416 / Consumer Sentinel Network Complaint

Reference Number:	102400416	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	No
Comments:	I am 81 years old and try to stay in contact with family on facebbook I made the mistake of clicking on a news article and instead was a pop-up saying mycomputer had a virus and to call their number at **NTS** IT Care inc I was afraid and was told that I needed antivirus for 249 00 I used a Visa and was told they would fix the problem. I later found out that this was part of a fraudulent scam that was actually listed many times on Google. I have applied for a new Visa card I actually have avg antivirus so I know the pop-up could have been deleted if I knew how and I should not have called the number I also gave them permission to control my computer from wherever they were working Other-Other Update		
Complaint disposition provided?:			
Complaint Disposition:			
Data Reference:		**Load Date:**	12/02/2018 9 33 56 AM
Created By:	FTCCIS-FTCUSER	**Created Date:**	12/02/2018 9 33 56 AM
Updated By:	CRSSlslyons1	**Updated Date:**	12/12/2018 12 43 05 PM
Complaint Source:	FTC Onkne Complaint Assistant (CIS)	**Product Service Description:**	Tech Support Scams
Amount Requested:	$249 00	**Amount Paid:**	$249 00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	12/02/2018	**Transaction Date:**	11/30/2018
Initial Contact:	I Initiated Contact	**Initial Response:**	Phone, 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP) Rule/Other	**Law Violation:**	Deception/Misrepresentation Other (Note the Violation in the Comment Field)
Topic:		**Dispute with Credit**	
Dispute with Credit Bureau - Responded?:		**Dispute with Credit Bureau - Resolved to Satisfaction?:**	
Member of armed forces or dependent?:	No	**Cross Border Complaint?:**	No

Consumer Information

Consumer Small Business or Organization:			
First Name:	Jeanne	**Last Name:**	**Schmidt**
Address 1:	[redacted]	**Address 2:**	
City:		**State:**	Ohio
Zip:		**Country:**	UNITED STATES
Home Number:		**Cell Number:**	
Work Number:		**Ext:**	
Fax Number:			
Email:		**Age Range:**	60 and Over
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

View Similar Subjects — **Subject** — Add Alert for this Subject

Subject:	**NTS** IT CARE	**Normalized Name:**	**Nts** It Care
Address:	1605 S Main St Ste		
City:	Milpitas	**State/Prov:**	California
ZIP:	95035	**Country:**	UNITED STATES

Jeanne Schmidt Attachment B-1

Email:		**URL:**	ntsitcare.com
Phone Number:	844-2082608	**Ext:**	
Subject ID Type:			
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Darius Reeves	**Title:**	assistant

Jeanne Schmidt Attachment B-2